

TSD File Inventory Index

Date: January 10, 2001

Initial: CM/Genevao

Facility Name: <u>Rea Magnet Wire Company (Wire Plant)</u>			
Facility Identification Number: <u>IND 005 478 219</u>			
A.1 General Correspondence	Y	B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	Y
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	Y
.4 Financial Insurance (Sudden, Non Sudden)	Y	.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total -1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3006(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual folder per schedule.*

A.1.3

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PUBLIC NOTICE OF RCRA CORRECTIVE ACTION COMPLETE

DATE OF NOTICE: August 9, 2010

COMMENTS DUE: September 24, 2010

The Indiana Department of Environmental Management (IDEM) has received a request for a RCRA Corrective Action Completion Determination Without Controls from:

Rea Magnet Wire Division
2800 Concord Avenue
Lafayette, Indiana 47909
Tippecanoe, U. S. EPA ID Number 005 478 219

IDEM has reviewed this request along with the administrative record, and has drafted a Statement of Basis proposing to end the corrective action process. IDEM concurs with Rea Magnet Wire Division's position that "No Further Action" is required at any of the Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs). A copy of the Statement of Basis and the supporting administrative record are available for your review at the IDEM Virtual File Cabinet at: <http://www.in.gov/idem/> document #57022127

IDEM is providing the public an opportunity to submit written comments and/or request changes to the Statement of Basis as proposed. You may request that IDEM hold a public hearing about this RCRA Corrective Action Completion Determination. At a hearing, you would have an opportunity to submit written comments, ask questions, make statements, and otherwise discuss any concerns about the Statement of Basis or the administrative record with IDEM staff. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing at least thirty (30) days in advance.

Written comments with supporting documentation, or a written request for a public hearing, should be sent to:

Chris L. Myer
IDEM, Office of Land Quality
Permits Branch, (Mail Code 66-20)
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

IDEM will respond to all significant comments and specify which provisions of the Statement of Basis were changed, if any. To receive a copy of the Notice of Final Decision and Response to Comments, please make a written request to the name and Office of Land Quality (OLQ) address above. Anyone who submits written comments will receive a copy of the Notice of Final Decision and Response to Comments.

If you have any questions about the Statement of Basis, administrative record, or the public participation process, please feel free to contact Chris L. Myer at the OLQ address above; or at 1-800/451-6027- extension 233-4625; or 317/ 233-4625; or by e-mail at cmyer@idem.IN.gov.

STATE BOARD OF HEALTH

INDIANAFOLIS

OFFICE MEMORANDUM

DATE: October 9, 1985

THRU: Ralph C. Pickard

TO: Art Logsdon
Office of Agency Communications

FROM: David D. Lamm, Director
Division of Land Pollution Control

SUBJECT: Public Notice of Closure Plan for
Rea Magnet Wire Company, Inc.
2800 Concord Road
Lafayette, Indiana
IND 005478219

RECEIVED

OCT 17 1985

SWB - AIS
U.S. EPA, REGION V

Attached is a Public Notice that should be placed in a newspaper
local for Lafayette, Indiana, and run for one day.

ROB/tr
Attachment
cc: Ms. Pat Vogtman, U.S. EPA, Region V
Tippecanoe County Health Department
Mr. Hak C. Cho, U.S. EPA, Region V

RECEIVED

OCT 16 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

PUBLIC NOTICE

The Technical Secretary of the Indiana Environmental Management Board has received a Policy 121 closure plan from Rea Magnet Wire Company, Inc., 2800 Concord Road, Lafayette, Indiana. The Company originally notified the U.S. Environmental Protection Agency as a storer of hazardous waste with the following hazardous waste activity: S01-drum storage. The plan proposes the elimination of the following hazardous waste activity: storage greater than 90 days.

Pursuant to 40 CFR 265, Subpart G, and 320 IAC 4-7-1, the Technical Secretary is providing the owner or operator and the public an opportunity to submit written comments on the plan and request modifications of the plan within thirty (30) days of date of this notice. Corrective action response letters have been sent to the facility to elicit information to ensure that there have been no uncorrected releases concerning hazardous wastes or hazardous waste constituents to the environment from any existing or former solid waste management units. This is to fulfill the U.S. EPA's obligation under the Hazardous and Solid Waste Amendments of November 8, 1984.

The Technical Secretary can also, in response to a request, hold a public hearing whenever such a hearing might clarify one or more issues concerning the plan or issues involving releases of hazardous waste or hazardous waste constituents from the facility. The Technical Secretary will give public notice of the hearing at least thirty (30) days before it occurs.

The plan and related background documents are available for inspection and copying by the public at the Indiana State Board of Health, Division of Land Pollution Control, 5500 West Bradbury Avenue, Indianapolis, Indiana, from 8:15 a.m. to 4:45 p.m., Monday through Friday. The plan is also available at the Tippecanoe County Health Department.

Persons wishing to comment on the plan should submit such comments in writing to:

Mr. Ralph C. Pickard
Technical Secretary
Indiana Environmental Management Board
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

For additional information, contact Mr. Reggie Baker at AC 317/243-5092.



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-13

MAY 23 1984

William Schilling, Plant Manager
REA Magnet Wire Company Inc.
2800 Concord Road
Lafayette, Indiana 47905

RE: Interim Status Acknowledgement U.S. EPA ID No. IND005478219
FACILITY NAME: REA Magnet Wire Company Inc.

Dear Mr. Schilling:

This is to acknowledge that the United States Environmental Protection Agency (U.S. EPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should U.S. EPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

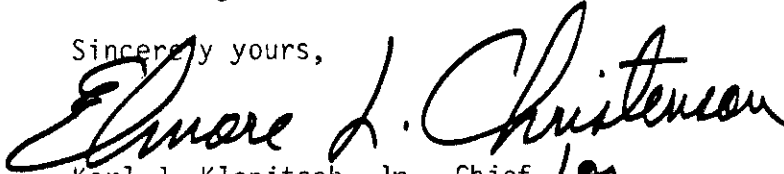
The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 270.10 and 270.72. (formerly 122.22 and 123.23)

The State of Indiana has received Phase I interim authorization under Section 3006 of RCRA. Because of this authorization you are required to comply with standards prescribed in the Indiana Administrative Code, 320 IAC, Article 4, in lieu of the standards in 40 CFR Part 265. (Please note that the State of Indiana has adopted most of the 40 CFR Part 265 standards in 320 IAC 4.) In addition, you are reminded that operating under interim status does not relieve you of the need to comply with other applicable Federal, State and local requirements.

Yellow Copy

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 270.70; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Ronald Foster



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

MAR 16 1983

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. T. A. Shelby, Manager, Chemical Services Department
Rea Magnet Wire Company, Incorporated
3600 East Pontiac Street
Fort Wayne, Indiana 46896

RE: Request for Information--Hazardous Waste Permit
Review (Small Quantity Generator)

FACILITY: NAME: Rea Magnet Wire Company, Incorporated
USEPA ID NO.: IND 005 478 219

Dear Mr. Shelby:

This is to acknowledge that the United States Environmental Protection Agency has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act; however, further clarification is needed.

Based on the information submitted, your facility appears to qualify for the small quantity generator exclusion as defined in 40 CFR Part 261.5 (enclosed). Please review these requirements to determine if your facility qualifies for the small quantity generator exclusion from November 19, 1980, to the present. If it does, a permit is not required, and you should withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed), requesting that your application be withdrawn. If at any time, since November 19, 1980, your operation (1) did not qualify for the special requirements for generators, of small quantities of hazardous wastes, and (2) included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found at 40 CFR Part 265 Subpart G.

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

If you have any questions, please do not hesitate to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance. Please refer to "Request for Information--Small Quantity Generator," in all telephone contacts and correspondence on this matter.

Sincerely, yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

cc: William Schilling, Plant Manager
Ronald Foster, Vice President, Manufacturing



Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
Fort Wayne, Indiana 46896
219 424-4252

1980 December 08

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

RE: Topographic Maps

In mid-November I sent in part A of the Consolidated Permits Program. In the cover letter with that application I stated I would send the topographic maps when I received them. Those maps are enclosed and should be filed as follows:

<u>Rea Magnet Wire Plant</u>	<u>Maps</u>
Lafayette, Indiana EPA ID No. IND005478219	Lafayette East Lafayette West
Fort Wayne, Indiana - Pontiac St. EPA ID No. IND004320032	Fort Wayne East
Fort Wayne, Indiana - Adams Center Road EPA ID No. IND021639109	Fort Wayne East

Now that we have these maps we can better calculate the latitude and longitude. They are:

<u>Plant</u>	<u>Latitude</u>	<u>Longitude</u>
Lafayette Fort Wayne - Pontiac Street	40° 23' 14"	86° 51' 42"
Fort Wayne - Adams Center Rd.	41° 03' 41"	85° 05' 05"
	41° 03' 41"	85° 03' 54"

Rea Magnet Wire Company, Inc.

T.A. Shelby
T.A. Shelby,
Manager - Chemical Services
Technology Department

TAS/eb

DEC 09 1980



Rea Magnet Wire Company, Inc.

3600 East Pontiac Street
Fort Wayne, Indiana 46896
219 424-4252

✓ IN D005478219 g B D PA
Filed IN D0216 39109 g B D PA
Filed IN D004320032 g T TSD PA

1980 November 25

Mr. Y.J. Kim
EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

3-25-82 MGP

RE: Future RCRA needs

call about Jan 26
Fed Reg

I have several questions and requests.

1. Please send to me 6 (six) of the 8700-13 and 8700 13A forms so I can complete the generator annual reports for next year.
2. Also, send to me 2 (two) of the 8700-13B forms so I can complete a treatment facility annual report. We have a solvent distillation reclaimer that we use in the plant.
3. I assume the storage areas will also need to fill out a 8700-13 form as well as a 8700-13B. Please send me 6 (six) of each of these forms. *do storage areas?*
4. Due to increased costs of incineration of our solvent bottoms, oils, and waste resin solutions we have decided to ask Management for the money to build our own incinerator. This means we will need Federal, State, and City/County permits. I would like to start with Federal permits. Please send the Consolidated permit form A (part 1 and 3) as well as form B (all parts). Please include any other forms and instructions we will need for this permit. We will burn about 100,000 gallon of solvents, oils and scrap resin solution per year. It will be generated at our four enamelling plants. *part A*
part B?
5. A couple of months ago I sent you a list of questions but never received an answer. Since I have not heard from anyone on these questions, I will assume I need to guess at what I think I should do. I do need a list of Hazardous Waste numbers not included in the May 19 - Part 261 publication. I have heard there are more numbers in the K series.
6. I am having trouble with the disposal sites requesting manifests on everything. (Water bases acrylic solution, water based soap solution with copper ions, high flash oil, etc.) These are not hazardous by the EPA definition, so what do we list them under?

Thanks for your assistance.

Sincerely,

Rea Magnet Wire Company, Inc.

T.A. Shelby

T.A. Shelby, Manager
Chemical Services Dept.

NOV 26 1980



106
Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
Fort Wayne, Indiana 46896
219 424-4252

1980 November 10

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

IND005478219

RE: Topographic Map for Rea Magnet Wire Company, Lafayette, Indiana

We have not been able to obtain a proper map from the U.S. Geological survey office. As soon as this map is obtained and verified, we will send it to you.

Please contact me if you have any questions on Forms 1.

REA MAGNET WIRE COMPANY, INC.

T.A. Shelby

T.A. Shelby
Manager - Chemical Services

TAS/eb



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• IND005478219 REACKNOWLEDGEMENT

INSTALLATION ADDRESS

REA MAGNET WIRE CO
3600 E PONTIAC STREET
FORT WAYNE IN 46896

2800 CONCORD RD
LAFAYETTE IN 47905

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 2 23 - 26	2 F 0 0 3 23 - 26	3 F 0 0 4 23 - 26	4 F 0 0 5 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary. None

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 0 5 4 23 - 26	32 U 1 5 9 23 - 26	33 U 2 2 6 23 - 26	34 U 2 2 8 23 - 26	35 U 2 3 9 23 - 26	36 U 0 7 7 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 U 1 5 1 23 - 26	44 U 2 3 8 23 - 26	45 D 0 0 8 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000) D008

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE T. A. Shelby	NAME & OFFICIAL TITLE (type or print) T.A. Shelby Mgr. Chemical Services	DATE SIGNED 8/11/10
---------------------------	--	------------------------

106

LAF.
Received 80/11/10



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

IND005478219

PEA MAGNET WIRE CO
3600 E PONTIAC STREET
FORT WAYNE

IN 46896

INSTALLATION ADDRESS

2800 concord Rd.

~~3600 E PONTIAC STREET~~
~~FORT WAYNE~~

IN ~~46896~~

Lafayette

47905

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

000002 SEP 12 80

IND005478219

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

IND005478219

A

800912

I. NAME OF INSTALLATION

REA MAGNET WIRE CO.

II. INSTALLATION MAILING ADDRESS

Mailing Address Only !!
PLEASE SEND CORRESPONDENCE TO:

T. A. Shelby
REA MAGNET WIRE COMPANY, INC.
3600 E. Pontiac Street
Fort Wayne, Indiana 46896

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

SHELBY THOMAS MGR. CHEM. SERV. 219-424-4252

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

ALUMINUM COMPANY OF AMERICA

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

M

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IND005478219

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

5	W	INDO05478219	MA	C
1	2	13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F002	2 F003	3 F004	4 F005	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary. *NONE*

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U054	32 U159	33 U226	34 U228	35 U239	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

T.A. Shelby

NAME & OFFICIAL TITLE (type or print)

T.A. SHELBY

MGR. CHEM. SERVICES

DATE SIGNED

1980/09/10

CONVERSATION RECORD

TIME

9:00a.

DATE

8-19-86

TYPE

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☒ INCOMING

☐ OUTGOING

ROUTING

NAME/SYMBOL

INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Harold Otis

ORGANIZATION (Office, dept., bureau, etc.)

Rea Magnet Wire Co.

TELEPHONE NO.

219
424-4252

SUBJECT

Change of ownership

IND005478219

SUMMARY

I informed Mr. Otis that he is required to submit revised Part A's for both Part A facilities in light of the change of ownership from the Aluminum Company of America to Rea Magnet Wire Co. Mr. Otis will submit the forms to the Indiana Department of Environmental Management (IDEM).

ACTION REQUIRED

Await changes from IDEM.

NAME OF PERSON DOCUMENTING CONVERSATION

SHARON KIDDO N

SIGNATURE

Sharon Kiddow

DATE

8-19-86

ACTION TAKEN

SIGNATURE

TITLE

DATE



ACB

Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
P. O. Box 6128
Fort Wayne, Indiana 46896-0128
Telephone: (219) 424-4252

1986 June 04

RECEIVED

JUN 25 1986

U.S. EPA, REGION V

RECEIVED
JUN 13 1986
SOLID WASTE BRANCH
U.S. EPA, REGION V

Regional Administrator
U.S. EPA Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Sirs:

This is to notify you that Rea Magnet Wire Company, Incorporated, with headquarters located at 3600 East Pontiac Street, Fort Wayne, Indiana 46896-0128, has been sold by Aluminum Company of America (located in Pittsburgh, Pennsylvania) to the executive officers of Rea Magnet Wire Company, Inc.

The following locations in the State of Indiana are involved:

<u>HEADQUARTERS & PLANT</u>	- 3600 E. Pontiac St., Fort Wayne, IN 46896-0128
<u>E.P.A. ID NO.</u>	- IND 004320032, NPDES No. IN 0036161
<u>INDIANA STATE AIR PERMIT NO.</u>	- 0206810385 - C, TR TSD, PA
<u>WAREHOUSE</u>	- 2808 Adams Center Road, Fort Wayne, IN 46806
<u>E.P.A. ID NO.</u>	- IND 021639109 - 2nd - PA
<u>PLANT</u>	- 2800 Concord Road, Lafayette, IN 47905
<u>E.P.A. ID NO.</u>	- IND 005478219 - C, TSD, PA
<u>INDIANA STATE AIR PERMITS</u>	- 7908820205 and 7903840243

Could you please see that this information is disseminated to the proper people, or notify me who (additionally) to send this information.

Thank you.

Sincerely,

REA MAGNET WIRE COMPANY, INC.

Harold R. Otis

Harold R. Otis
Manager, Environmental/Hygiene

cc: K. Nay - Rea Wire, Fort Wayne
B. Roberts - Rea Wire, Lafayette
G. Smith - Rea Wire, Adams Center Road
J. Vann - Rea Wire, Fort Wayne
R. Westenfeld - Rea Wire, Fort Wayne

RECEIVED

JUN 11 1986

AIR COMPLIANCE BRANCH
U.S. EPA, REGION V, AND



206
Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
Fort Wayne, Indiana 46896
219 424-4252

1980 November 17

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

IND005478219

RE: Form 3 Information

This form is for our Lafayette, Indiana manufacturing facility. All quantities given on page 3A are the amounts we should be able to generate of any one waste material. I expect the average to be much less.

This facility is owned and operated by Rea Magnet Wire Company; however, all of the Rea stock is now owned by the Aluminum Company of America. This is why I chose to answer sections VIII and IX on page 4 with an explanation.

We will send you more accurate information for section VII as soon as we receive it.

The enclosed facility drawing shows the property lines and the buildings. The (X's) beside the building gives the approximate location of the waste storage area and the (Y) is the non-hazardous material drum storage.

Rea Magnet Wire Company, Inc.

T. A. Shelby
T.A. Shelby
Manager - Chemical Services

TAS/eb



Rea Magnet Wire Company, Inc.

3600 East Pontiac Street
Fort Wayne, Indiana 46896
219 424-4252

1980 November 11

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

IND005478219

RE: NOTIFICATION AND ADDRESS

The installation address for the above number is incorrect on your form
8700-12A (4-80). It should be:

2800 Concord Lane
Lafayette, Indiana 46905


The Corporate Headquarters address on the form is correct.

Rea Magnet Wire Company, Inc.

T.A. Shelby

T.A. Shelby, Manager
Chemical Services Dept.

TAS/eb

FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> (Read the "General Instructions" before starting.)	I. EPA I.D. NUMBER	
			F I V D 0 0 5 4 7 8 2 1 9	
LABEL ITEMS			GENERAL INSTRUCTIONS	
II. A.I.D. NUMBER			<p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>	
III. FACILITY NAME				
V. FACILITY MAILING ADDRESS				
VI. FACILITY LOCATION				
PLEASE PLACE LABEL IN THIS SPACE				

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	REA MAGNET WIRE COMPANY INC
---	------	-----------------------------

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)		
2	SCHILLING WILLIAM PLANT MGR	317	474	3458

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	2800 CONCORD ROAD	4	LAFAYETTE	IN	47905

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	2800 CONCORD ROAD	6	TIPPECANOE	7	LAFAYETTE	IN	47905	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)									
A. FIRST					B. SECOND				
C	7	3	3	5	(specify) Drawing and insulating of non-ferrous wire	C	7		(specify)
15	16	17	18	19	15	16	17	18	19
C. THIRD					D. FOURTH				
C	7			(specify)	C	7			(specify)
15	16	17	18	19	15	16	17	18	19

VIII. OPERATOR INFORMATION																					
A. NAME																					
C	8	R	E	A	M	A	G	N	E	T	W	I	R	E	C	O	M	P	A	N	Y
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	
B. Is the name listed in Item VIII-A also the owner?																					
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																					
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																					
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE																					
P																					
D. PHONE (area code & no.)																					
A 2 1 9 4 2 4 4 2 5 2																					
15 16 17 18 19 20 21 22 23 24 25																					
E. STREET OR P.O. BOX																					
3 6 0 0 E A S T P O N T I A C S T																					
20 21 22 23 24 25 26 27 28 29 30																					
F. CITY OR TOWN																					
B F O R T W A Y N E																					
15 16 17 18 19 20 21 22 23 24 25																					
G. STATE																					
I N																					
4 1 4 2 4 3 4 4 4 5 4 6																					
H. ZIP CODE																					
4 6 8 9 6																					
47 48 49 50 51 52 53 54 55 56																					
IX. INDIAN LAND																					
Is the facility located on Indian lands?																					
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																					
52 53 54 55 56 57 58 59 60 61																					

X. EXISTING ENVIRONMENTAL PERMITS									
A. NPDES (Discharges to Surface Water)					D. PSD (Air Emissions from Proposed Sources)				
C	9	N			C	9	P		
15	16	17	18	19	15	16	17	18	
B. UIC (Underground Injection of Fluids)					E. OTHER (specify)				
C	9	U			C	9			
15	16	17	18	19	15	16	17	18	
C. RCRA (Hazardous Wastes)					E. OTHER (specify)				
C	9	R			C	9			
15	16	17	18	19	15	16	17	18	
					7 9 0 8 8 2 0 2 0 5				
					(specify) State Air Permit				
					7 9 0 3 8 4 0 2 4 3				
					(specify) State Air Permit				

XI. MAP									
Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.									

XII. NATURE OF BUSINESS (provide a brief description)									
This installation is a magnet wire manufacturing plant which has facilities for wire drawing, wire coating, rewinding, wire testing and wire packaging.									

XIII. CERTIFICATION (see instructions)									
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.									
A. NAME & OFFICIAL TITLE (type or print)					B. SIGNATURE			C. DATE SIGNED	
Ronald Foster Vice President - Manufacturing					Ronald B. Foster			80/11/14	

COMMENTS FOR OFFICIAL USE ONLY									
C									
15	16	17	18	19	20	21	22	23	24

FORM 3 RCRA		EPA		ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)		I. EPA I.D. NUMBER	
						FIND005478219	
FOR OFFICIAL USE ONLY						COMMENTS	
APPLICATION PROVED		DATE RECEIVED (yr., mo., & day)					
23		24		29			
II. FIRST OR REVISED APPLICATION							
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.							
A. FIRST APPLICATION (place an "X" below and provide the appropriate date)							
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)							
<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)							
YR. MO. DAY		FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)		YR. MO. DAY		FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN	
8 59 01 01				73 74 75 76 77 78		73 74 75 76 77 78	
B. REVISED APPLICATION (place an "X" below and complete Item I above)							
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS							
<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT							
III. PROCESSES - CODES AND DESIGN CAPACITIES							
A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).							
B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.							
1. AMOUNT - Enter the amount.							
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.							
PROCESS		PRO-CESS CODE		APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY		PROCESS	
Storage:						Treatment:	
CONTAINER (barrel, drum, etc.)		S01		GALLONS OR LITERS		T01	
TANK		S02		GALLONS OR LITERS		T02	
WASTE PILE		S03		CUBIC YARDS OR CUBIC METERS		T03	
SURFACE IMPOUNDMENT		S04		GALLONS OR LITERS		T04	
Disposal:							
INJECTION WELL		D79		GALLONS OR LITERS		OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	
LANDFILL		D80		ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER		T04	
LAND APPLICATION		D81		ACRES OR HECTARES		GALLONS PER DAY OR LITERS PER DAY	
OCEAN DISPOSAL		D82		GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT		D83		GALLONS OR LITERS			
UNIT OF MEASURE		UNIT OF MEASURE CODE		UNIT OF MEASURE		UNIT OF MEASURE CODE	
GALLONS		G		LITERS PER DAY		V	
LITERS		L		TONS PER HOUR		D	
CUBIC YARDS		Y		METRIC TONS PER HOUR		W	
CUBIC METERS		C		GALLONS PER HOUR		E	
GALLONS PER DAY		U		LITERS PER HOUR		H	
ACRE-FEET		A		HECTARE-METER		F	
ACRES		B		HECTARES		Q	
EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.							
S		C		T/A		C	
1 2		13 14 15		16 17 18 19		20 21 22 23 24 25 26 27 28 29 30 31 32	
X-1		S 0 2		600		G	
X-2		T 0 3		20		E	
1		S 0 1		15,000		G	
		S 0 2		605		G	
3							
4							

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																
W I N D 0 0 5 4 7 8 2 1 9													W DUP																
DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES																
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))											
	23	24	25	26	27	28	29	30		31	32	33	34	35	36	37	38		39	40	41	42	43	44	45	46	47	48	49
1	F	0	0	4	500,000				P	T	0	3	T	0	4														Some is sent to Rea reclaimer
2	F	0	0	3	17,000				P	T	0	3																	
3	D	0	0	2	2,000				P	T	0	3	D	8	0														Most is neutralized
4	D	0	0	1	2,000				P	T	0	3	T	0	4														Metal is sold to reclaimer
5	U	0	5	4	1,000				P	T	0	4																	Sent to Rea reclaimer
6	U	2	3	9	2,000				P	T	0	4																	Sent to Rea reclaimer
7	U	2	2	6	1,000				P	T	0	3	T	0	4														Some is sent to a reclaimer
8	F	0	0	5	1,000				P	T	0	3																	
9	U	0	7	7	500				P	T	0	3	T	0	4														Some is sent to a reclaimer
10	U	1	5	1	10				P	T	0	4																	Sent to reclaimer by R&D
11	D	0	0	8	50				P	D	8	0																	
12	U	2	3	8	400				P	T	0	3																	
13	F	0	0	2	2,000				P	T	0	3	T	0	4														Some sent to a reclaimer
14																													
15																													
16																													
17																													
18																													
19																													
20																													
21																													
22																													
23																													
24																													
25																													
26																													

IV. DESCRIPTION OF HAZARDOUS WASTES

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	I	N	D	0	0	5	4	7	8	2	1	9	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

4	0	2	4		
65	66	67	68	69	71

our best calculation at this time

0	8	6	5	3	
72	74	75	76	77	79

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below. See cover letter

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E	ALUMINUM COMPANY OF AMERICA
15	16	

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F	1501 ALCOA Building
15	16	

C	G	Pittsburgh
45	15	16

P	A
40	41

1	5	2	1	9
47	48	49	50	51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

 Ronald Foster for
Rea Magnet Wire Company, Inc.

Ronald B. Foster

80/11/14

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

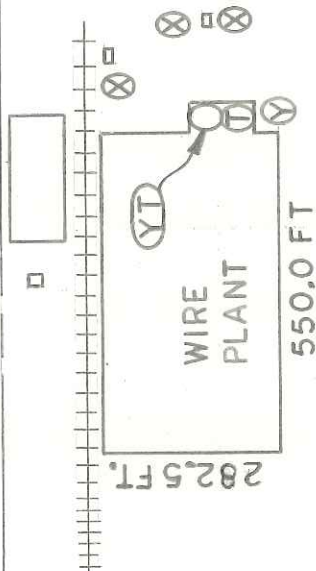
B. SIGNATURE

C. DATE SIGNED

V. FACILITY DRAWING (see page 4)



2642.6 FT.



993.8 FT.

CONCORD ST.

2640.2 FT.

REA MAGNET WIRE CO., INC.
LAFAYETTE, INDIANA

DATE: NOV. 12, 1980

SCALE: 0.1" = 300.0'

⊗ --- DRUM STORAGE
① --- LIQUID WASTE TANK
⊗ --- NON-H. M. WASTE STORAGE
○ --- NON-H. M. LIQUID WASTE TANK

YT

106

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W I N D 0 0 5 4 7 8 2 1 9 T A C 1													W 1 2 DUP T A C 2 DUP												
IV DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																		
	23	24	25	26			1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))										
1	F	0	0	4	500,000	P	T 0 3	T 0 4	S 0 1	S 0 2	Some is sent to Rea reclaimer														
2	F	0	0	3	17,000	P	T 0 3	S 0 1																	
3	D	0	0	2	2,000	P	T 0 3	D 8 0	S 0 1								Most is neutralized								
4	D	0	0	1	2,000	P	T 0 3	T 0 4	S 0 1								Metal is sold to reclaimer								
5	U	0	5	4	1,000	P	T 0 4	S 0 1								Sent to Rea reclaimer									
6	U	2	3	9	2,000	P	T 0 4	S 0 1								Sent to Rea reclaimer									
7	U	2	2	6	1,000	P	T 0 3	T 0 4	S 0 1								Some is sent to a reclaimer								
8	F	0	0	5	1,000	P	T 0 3	S 0 1																	
9	U	0	7	7	500	P	T 0 3	T 0 4	S 0 1								Some is sent to a reclaimer								
10	U	1	5	1	10	P	T 0 4	S 0 1								Sent to reclaimer by R&D									
11	D	0	0	8	50	P	D 8 0	S 0 1																	
	U	2	3	8	400	P	T 0 3	S 0 1																	
13	F	0	0	2	2,000	P	T 0 3	T 0 4	S 0 1								Some sent to a reclaimer								
14																									
15																									
16																									
17																									
18																									
19																									
20																									
21																									
22																									
23																									
24																									
25																									
26																									

IV. DESCRIPTION OF HAZARDOUS WASTES

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PESTICIDE CODES FROM ITEM D(1) ON PAGE 3

EPA I.D. NO. (enter from page 1)

S	F	I	N	D	0	0	5	4	7	8	2	1	9	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

A

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

B

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

4	0	2	4		
65	66	67	68	69	71

our best calculation at this time

0	8	6	5	3	
72	74	75	76	77	79

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below. See cover letter

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E	ALUMINUM COMPANY OF AMERICA
15	16	

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F	1501 ALCOA Building
15	16	

C	G	Pittsburgh
15	16	

P	A
40	42

1	5	2	1	9
47	51			

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Ronald Foster for
Rea Magnet Wire Company, Inc.

B. SIGNATURE

Ronald B. Foster

C. DATE SIGNED

80/11/14

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

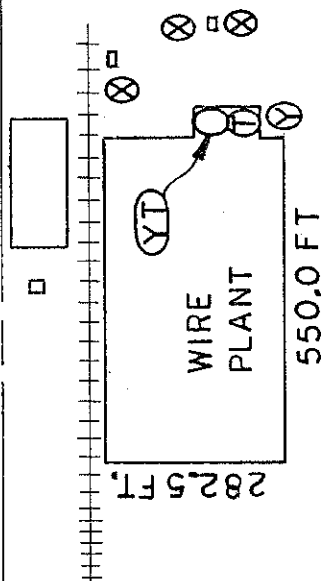
B. SIGNATURE

C. DATE SIGNED

V. FACILITY DRAWING (see page 4)



2642.6 FT.



CONCORD ST.

993.8 FT.

2640.2 FT.

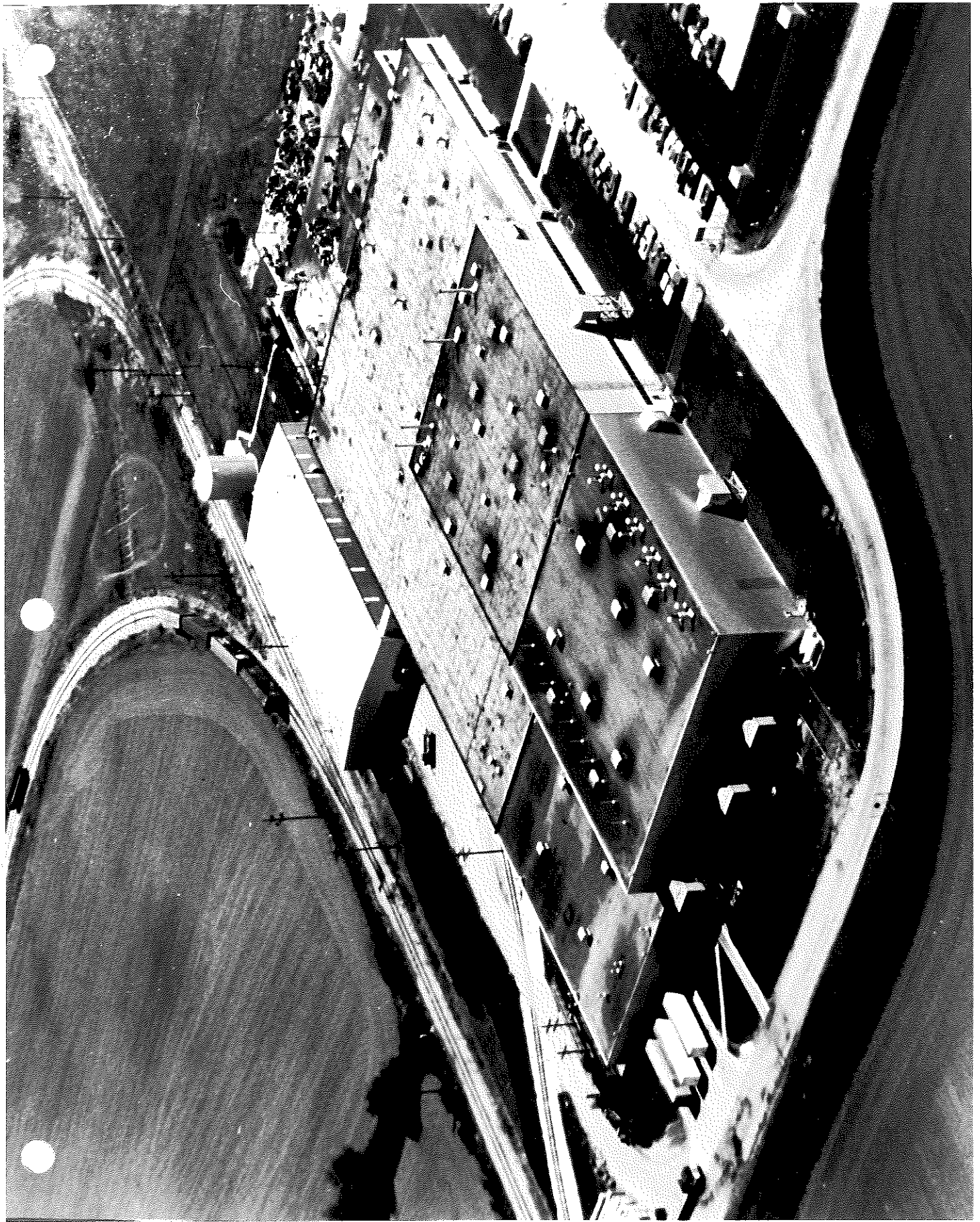
REA MAGNET WIRE CO. INC.
LAFAYETTE, INDIANA

DATE: NOV. 12, 1980

SCALE: 0.1" = 300.0'

⊗ — — — — — DRUM STORAGE
① — — — — — LIQUID WASTE TANK
⊗ — — — — — NON-H. M. WASTE STORAGE
○ — — — — — NON-H. M. LIQUID WASTE TANK

YT



A.4 Closure/Post-
Closure

STATE OF INDIANA

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT



INDIANAPOLIS, 46225

105 South Meridian Street

RECEIVED

NOV 07 1986

U.S. EPA, REGION V

November 3, 1986

RECEIVED

NOV 05 1986

SOLID WASTE BRANCH
U.S. EPA, REGION V

Mr. Hak Cho, Chief
Indiana Unit
U.S. Environmental Protection Agency
230 South Dearborn
Chicago, IL 60604

Re: Rea Magnet Wire Company, Inc.
Lafayette, IN
IND 005478219

Dear Mr. Cho:

On September 25, 1986, Rea Magnet and Wire, Inc. submitted the attached Container/Storage Closure Request (EPA Policy #121) concerning closure of drum storage area at the site. On June 25, 1986, the Department of Environmental Management approved this closure plan (letter enclosed) and on June 27, 1986, staff from the Office of Solid and Hazardous Waste Management conducted the required Policy 121 Closure Inspection with the enclosed results.

Based on this information we request that the Part A for this facility be withdrawn and the facility be reclassified as a generator only.

If comments from your office are not received within 30 days of the date of this letter, we will assume you are in agreement with our decision and that you will proceed with the withdrawal of their Part A application.

Mr. Hak Cho
Page 2

If you have any questions in regard to this matter, please contact
Mr. Bob Cappiello of my staff at AC 317/232-3221.

Very truly yours,

Terry F. Gray

Terry F. Gray, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RJC/baw

Enclosures

cc: Mr. Ronald B. Foster, Rea Magnet Wire Co., Inc.

Mr. Thomas O'Leary

RCRA File ICId

CONTAINER/STORAGE CLOSURE REQUEST (EPA POLICY #121)

"GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN
STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

Facility Name: REA MAGNET WIRE COMPANY, INC.
Facility Location: 2800 CONCORD ROAD, LAFAYETTE, IN 47905
Mailing Address: SAME
U.S. EPA ID No.: IND005478219

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site, in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of
1985 September 23
(Please type, in above space: today's date,
or other appropriate past date)
2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed, and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.
3. I finally certify under penalty of law that I have personally examined, and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Ronald B. Foster Ronald B. Foster
V.P. Manufacturing 85/9/25
Signature Typed Name and Title Date

(Please have appropriate official, per 40 CFR 270.11, sign and date)

5HE-12

NOV 20 1985

Thomas Russell, Chief
Enforcement Section
Division of Land Pollution Control
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, Indiana 46206-1964

Re: Rea Magnet Wire Company, Inc.
IND 004 320 032
IND 005 478 219
Policy #9306-006

*see other location (032)
for file*

Dear Mr. Russell:

The enclosed letter dated October 23, 1985, was submitted to the United States Environmental Protection Agency (U.S. EPA) by CU Special Risks.

This letter is a notice of insurance cancellation effective December 5, 1985, for the above-referenced facilities. Please investigate this information and pursue any appropriate State compliance activity to assure that the facilities have demonstrated adequate financial assurance.

If you have any questions, please contact Ms. Zetta Thomas of my staff at (312) 886-4555.

Sincerely yours,

Joseph M. Boyle, Chief
IL/IN Unit
RCRA Enforcement Section

Enclosure

cc: Jeffrey Stevens, ISBH

bcc: Pat Vogtman

OTHER STAFF	IL/IN UNIT	SECT. ENF.	FILE
SKS 11/18/85	JMB 11/15/85	AP 11/14/85	WJ 11/20/85

5HE:12:Zetta:lr:6-4555:11/12/85



1985 September 26

RECEIVED

SEP 30 1985

SWB - AIS
U.S. EPA, REGION V

Rea Magnet Wire Company, Inc.
Subsidiary of
Aluminum Company of America
3600 East Pontiac Street
P.O. Box 6128
Fort Wayne, Indiana 46896-0128
Telephone: (219) 424-4252

Mr. Ralph C. Pickard
Technical Secretary
Indiana Environmental Management Board
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

Dear Mr. Pickard,

Attached is a signed copy of EPA's Policy #121. We are requesting closure of the storage facilities at the Rea Magnet Wire Co., Inc. plant which is located at 2800 Concord Road in Lafayette, Indiana. EPA ID# IND005478219. *G TSD PA*

The plant has essentially been operating as a "generation only" since January 1985 and the plant management feels that as of 1985 September 23, they are in compliance and will be able to dispose of all hazardous waste within 90 days.

If you have any questions, please feel free to contact me at 219/424-4252, Ext. 206.

Sincerely,

Sharon R. Huey
Industrial Hygienist

SH/cm

cc: K. Burch, US EPA Region V
✓ H. Cho, US EPA Region V
N. Ayala, Rea
R. Foster, Rea
A. Knoll, Rea
J. Stauffer, Rea

CONTAINER/STORAGE CLOSURE REQUEST (EPA POLICY #121)

"GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN
STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

Facility Name: REA MAGNET WIRE COMPANY, INC.
Facility Location: 2800 CONCORD ROAD, LAFAYETTE, IN 47905
Mailing Address: SAME
U.S. EPA ID No.: INDO05478219

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site, in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of
1985 September 23
(Please type, in above space: today's date,
or other appropriate past date)
2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed, and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.
3. I finally certify under penalty of law that I have personally examined, and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Ronald B. Foster

Ronald B. Foster
V.P. Manufacturing

85/9/25

Signature

Typed Name and Title

Date

(Please have appropriate official, per 40 CFR 270.11, sign and date)

STATE OF INDIANA

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT



INDIANAPOLIS, 46225

105 South Meridian Street

Ms. Claudia J. Burton
Rea Magnet Wire Co., Inc.
2800 Concord Road
Lafayette, IN 47905

RECEIVED OCT 10 1986
OCT 14 1986
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Re: Notice of Compliance, Case No. (V-243)
Rea Magnet Wire Co., Inc.
EPA I.D. No. IND 005478219
Lafayette, Indiana

Dear Ms. Burton:

Based upon documents available to Office of Solid and Hazardous Waste Management staff during a record review on September 15, 1986, and the results of a reinspection conducted at your facility on May 1, 1986, it has been determined that Rea Magnet Wire Co., Inc., has achieved compliance with the terms of the Notice of Violation issued to your firm on December 4, 1985.

Thank you for your cooperation. If you have any questions concerning this matter, feel free to contact Mr. Robert Malone of the Office of Solid and Hazardous Waste Management at AC 317/232-3409.

Very truly yours,

David D. Lamm
Assistant Commissioner for
Solid and Hazardous Waste Management

cc: Tippecanoe County Health Department
Ms. Sally Swanson, U.S. EPA, Region V ✓
Mr. Thomas O'Leary

STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



INDIANAPOLIS, 46225

105 South Meridian Street

July 16, 1986

Mr. Nelson Ayala
Rea Magnet Wire
2800 Concord Road
Lafayette, IN 47905

Dear Mr. Ayala:

Re: RCRA Notice of Inadequacy (V-243)
Rea Magnet Wire
IND 005478219

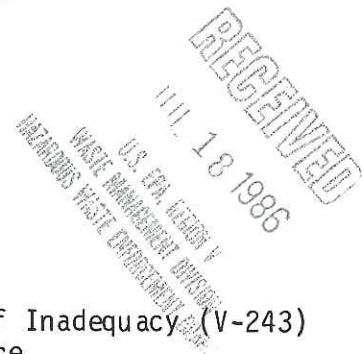
This will acknowledge the receipt of information from Rea Magnet Wire on March 17, 1986. This information was submitted in response to our letter of February 17, 1986, citing violations of the Federal Resource Conservation and Recovery Act (RCRA) and 320 IAC 4.1.

Staff has reviewed the materials submitted and determined that they are inadequate to achieve compliance with RCRA and 320 IAC 4.1. Our concern pertaining to these materials is:

1. Hazardous waste management training job descriptions lacked required skills, education, or other qualifications necessary to fill each job title.

Please revise these materials and submit them to our office within thirty (30) days.

Also enclosed is Attachment 2 of your previous submittal. This office, in accordance with your request, did not place the information in the public file. However, since the material was not submitted correctly under the Indiana Confidentiality Rules, this office must return the information so it does not reach the public file.



If you have any questions, please call Mr. Robert Malone of the Office of Solid and Hazardous Waste Management, Department of Environmental Management, at AC 317/232-3409.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas Russell".

Thomas Russell, Chief
Enforcement Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RDM/lsm

Enclosure

cc: Tippecanoe County Health Department

Ms. Sally K. Swanson, U.S. EPA, Region V

Mr. Thomas O'Leary

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

OFFICE MEMORANDUM

TO: RCRA File 1B1
Rea Magnet Wire Company

FROM: Thomas O'Leary *TEO*
Compliance Monitoring Section

SUBJECT: Policy 121 Closure Inspection
Rea Magnet Wire Company
IND 005478219

DATE: June 27, 1986

THRU: Dave Berrey *DB*

On May 1, 1986, Mr. Jeff Michael and I conducted a Policy 121 closure inspection of the Rea Magnet Wire Company, 2800 Concord Road, Lafayette. Mr. Nelson Ayala, Technical Manager, was the facility representative.

A previous generator compliance inspection was done by me in November 1985. The facility was acting as a generator at this time. (See T. R., November 19, 1985.)

All wastes noted had accumulation dates indicating less than 90 day storage. A review of the manifests confirmed this.

Based on this inspection, it is recommended that Rea Magnet be allowed generator status only.

TEO/cl

cc: Mr. Dennis Williamson, Plan Review and Permit Section ✓

STATE OF INDIANA

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT



INDIANAPOLIS, 46225

105 South Meridian Street

JUN 25 1986

Via Certified Mail

Mr. Ronald B. Foster
Rea Magnet Wire Company, Inc.
2800 Concord Road
Lafayette, IN 47905

RECEIVED

JUL 07 1986

Dear Mr. Foster:

SOLID WASTE BRANCH
U.S. EPA, REGION V

Re: Rea Magnet Wire Company, Inc.
Lafayette, Indiana
IND 005478219

Pursuant to 40 CFR 265.112 and 320 IAC 4.1-21-3(d), the Commissioner of the Indiana Department of Environmental Management has approved the closure plan submitted by Rea Magnet Wire Company, Inc., on September 30, 1985.

Rea Magnet Wire Company, Inc., originally notified the U.S. Environmental Protection Agency as a storer of hazardous waste with the following hazardous waste activities: S01-drum storage. The approved plan calls for the elimination (closure) of S01-drum storage.

The plan was reviewed by staff of the Office of Solid and Hazardous Waste Management, Indiana Department of Environmental Management. The public comment period began on October 24, 1985, and ended on November 24, 1985. No comments were received.

In addition, Section 206 of the Hazardous and Solid Waste Amendments of 1984 (HSWA) requires that corrective actions be performed for all releases of hazardous waste or constituents from any solid waste management unit. The U.S. Environmental Protection Agency (EPA) has the authority to implement this provision, therefore a facility may still be subject to HSWA requirements.

Please direct all questions regarding the closure process to
Mr. Dennis Williamson at AC 317/232-3221.

Sincerely,

A handwritten signature in cursive script that reads "David M. Wagner". The signature is written in dark ink and is positioned above the typed name.

Nancy A. Maloley, Commissioner
Department of Environmental Management

DEW/cl

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Pat Vogtman, U.S. EPA, Region V



G, PA

RECEIVED

JUL 07 1986

June 19, 1986

RECEIVED
JUL 1 1986

Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
P. O. Box 6128
Fort Wayne, Indiana 46896-0128
Telephone: (219) 424-4252

Region Administrator
U.S. EPA Region V
230 South Dearborn Street
Chicago, IL 60604

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

U.S. EPA, REGION V
SOLID WASTE BRANCH

JUL 01 1986

RE: Exception Report - Uniform Hazardous Waste Manifest
IND 005478219 80086

RECEIVED

Dear Sir:

On January 30, 1986, a tote containing spent cleaning solvent was shipped via a Rea truck from our Lafayette, Indiana plant to our Pontiac Street plant in Fort Wayne, Indiana for solvent reclamation. The tote was delivered to our Adams Center Plant, a distribution facility in Fort Wayne, where it was transferred to our city truck for final delivery to the Pontiac Street plant. The first driver properly signed the Uniform Hazardous Waste Manifest as required. No other signatures were obtained (except for the generator's) and, at this time we can locate only the generator's copy and the Transporter 1 copy of the manifest. The Pontiac Street plant has no receiving records for totes on or about the date in question.

An inventory taken of all totes in our possession has accounted for all 84 totes which we own. We now believe that one of two possible explanations are consistent with the known facts:

1. The city driver delivered the tote directly to the Enamel Mix facility at the Pontiac Street plant. Finding no one there, he unloaded the tote himself and went about his business. Later, third shift Enamel Mix personnel reported to work and handled the tote in a routine manner; i.e. the contents were pumped into a scrap tank for processing and the empty tote was set aside for cleaning.
2. The city driver delivered the tote and other materials to the Receiving Department at the Pontiac Street plant. The tote was unloaded by Receiving personnel and was delivered, by them, to Enamel Mix whereupon it was treated as described above.

As a result of this incident, the following steps have been taken:

1. A company Environmental Incident Report has been completed which has been distributed to all plants and to all members of the Hazardous Materials Committee and the Hazardous Material Co-ordinators.
2. A seminar was held on May 17, 1986, with all Rea drivers and contract drivers, where we reviewed the Uniform Hazardous Waste Manifest. Particular attention was paid to a policy requirement that our trucks are not to be loaded or unloaded unless a responsible individual was available to

June 19, 1986

sign and date the manifest. At that meeting, we distributed and reviewed the use of an internal manual containing a condensation of the labelling, manifesting and placarding regulations which apply to our business.

3. A tracking board will be installed in the Enamel Mix Department at the Pontiac Street plant which will be used to monitor tote movements. Each tote will be tracked by serial number and content as well as location.
4. The serial number of each tote will be included on all shipping and receiving documents.

A copy of the manifest in question is attached.

Sincerely,



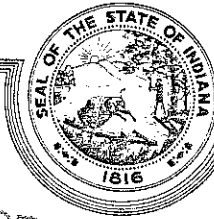
R. A. Westenfeld
Manager, Process Engineering

RW/ca

cc: E. J. Scherrer - General Manager, Technology
H. R. Otis - Manager, Environmental Hygiene
R. L. Jones - Supervisor, Enamel Mix
N. P. Ayala - Plant Manager, Laurinburg
R. E. Roberts - Plant Manager, Lafayette
G. M. Smith - Plant Manager, Adams Center
K. D. Nay - Plant Manager, Pontiac Street

UNIFORM HAZARDOUS WASTE MANIFEST		21. Generator's US EPA ID No.	Manifest Document No.		2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address REN MAGNET WIRE CO INC. 2200 CONCORD RD LAFAYETTE IN 47905					A. State Manifest Document Number		
4. Generator's Phone (317) 474-3435					B. State Generator's ID		
5. Transporter 1 Company Name REN MAGNET WIRE CO INC					6. US EPA ID Number IND004330032		
7. Transporter 2 Company Name					8. US EPA ID Number		
9. Designated Facility Name and Site Address REN MAGNET WIRE CO INC 3400 E. PORTLAND ST FORT WAYNE IN 47104					10. US EPA ID Number IND004330032		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)					12. Containers	13. Total Quantity	14. Unit Wt/Vol
					No.	Type	
a.	USED PHENOL SOLUTION, POISON B, UN 1671 (CRESYLIC ACID)				1	TT	2.632 lb
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above					K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information LUGGAGE READ - POISON / FLAMMABLE PILLOW READ - FLAMMABLE							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.							
Printed/Typed Name NELSON P AYALA					Signature [Signature]		Month Day Year 11 24 86
17. Transporter 1 Acknowledgement of Receipt of Materials					Signature [Signature]		Month Day Year 11 24 86
Printed/Typed Name					Signature		Month Day Year
18. Transporter 2 Acknowledgement of Receipt of Materials					Signature		Month Day Year
Printed/Typed Name					Signature		Month Day Year
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name					Signature		Month Day Year

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

RECEIVED

FEB 19 1986

February 17, 1986

VIA CERTIFIED MAIL

Mr. Nelson Ayala
REA Magnet Wire
2800 Concord Road
Lafayette, IN 47905

U.S. EPA REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Dear Mr. Ayala:

Re: RCRA Notice of Inadequacy (V-243)
REA Magnet Wire
IND 005478219

This will acknowledge the receipt of information from REA Magnet Wire on January 2, 1986. This information was submitted in response to our letter of December 4, 1985, citing violations of the Federal Resource Conservation and Recovery Act (RCRA) and Environmental Management Board (EMB) 320 IAC 4.1.

Staff has reviewed the materials submitted and determined that they are inadequate to achieve compliance with RCRA and 320 IAC 4.1. Our concerns pertaining to these materials are:

1. Submit copies of test results and analyses of waste streams generated at your facility.
2. Submit copies of hazardous waste management personnel training records including:
 - a. Job titles
 - b. Job descriptions
 - c. Names of employees filling specific job titles
 - d. Dates of personnel training, including the most recent update
 - e. A summary of the personnel training given, including the most recent update

Please revise these materials and submit them to our office within thirty (30) days.

If you have any questions, please call Mr. Robert Malone of the Division of Land Pollution Control, Indiana State Board of Health, at AC 317/243-5052.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas Russell".

Thomas Russell, Chief
Enforcement Section
Hazardous Waste Management Branch
Division of Land Pollution Control

RDM/tr

cc: Tippecanoe County Health Department
Ms. Sally K. Swanson, U.S. EPA, Region V
Mr. Thomas O'Leary



Rea Magnet Wire Company, Inc.
Subsidiary of
Aluminum Company of America
2800 Concord Road
Lafayette, Indiana 47905
Telephone: (317) 474-3455

January 30, 1986


Attn: RCRA Activities
Region V
P.O. Box A 3587
Attn: ATKJG
Chicago, Illinois 60690

Dear Sir:

Enclosed, please find Periodic Compliance Reports for Copper and Aluminum Forming Standards.

If you have any questions please feel free to contact me at 317-474-3455.

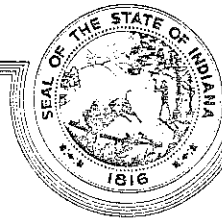
Sincerely,


Nelson P. Ayala
Technical Manager

enclosures

cc: S. Huey
H. Otis

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

VIA CERTIFIED MAIL

December 4, 1985

Mr. Nelson Ayala
Rea Magnet Wire Company
2800 Concord Road
Lafayette, IN 47905

Dear Mr. Ayala:

Re: RCRA Compliance Inspection
Rea Magnet Wire Company
IND 005478219
Notice of Violation (V-243)

The Environmental Management Board is cooperating with the U.S. Environmental Protection Agency, Region V (U.S. EPA), in carrying out the provisions of the Resource Conservation and Recovery Act, Public Law 94-580 (RCRA). In this effort, representatives of the Environmental Management Board are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of hazardous waste. In addition to RCRA requirements, facilities are being inspected to determine compliance with Environmental Management Board 320 IAC 4.1, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements."

This is to inform you that on November 7, 1985, an inspection of Rea Magnet Wire Company, located at 2800 Concord Road, Lafayette, Indiana, was conducted by Mr. Thomas O'Leary of the Division of Land Pollution Control (Division), Indiana State Board of Health. You represented your firm at this inspection.

The following violations of RCRA and 320 IAC 4.1 pertaining to the operation of your facility were noted:

- | | |
|---|---|
| 1. 320 IAC 4.1-10-1
and
40 CFR 262.40 | Test results and analyses are not retained on-site for at least three (3) years. |
| 2. 320 IAC 4.1-16-7
and
40 CFR 262.34 | Personnel training records do not include job titles, job descriptions, or names of employees who received hazardous waste management training. |

- | | |
|---|--|
| 3. 320 IAC 4.1-18-3
and
40 CFR 262.34 | The contingency plan does not describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams. |
| 4. 320 IAC 4.1-18-3
and
40 CFR 262.34 | The contingency plan does not list home addresses of all persons who may assume responsibility as emergency coordinators. |
| 5. 320 IAC 4.1-9-5
and
40 CFR 262.34 | Hazardous waste was stored by generator for more than ninety (90) days. There were two (2) drums of F003 that had been stored since July 1, 1985. |

Rea Magnet Wire Company, within thirty (30) calendar days of receipt of this letter, shall achieve compliance with the following requirements:

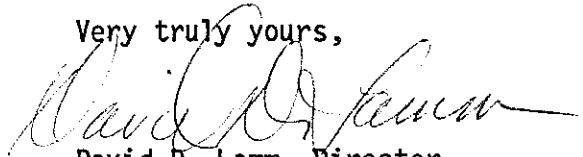
1. All test results and analyses shall be retained on-site for at least three (3) years.
2. Revise personnel training records to include job titles, job descriptions, and the names of employees who receive hazardous waste management training.
3. Revise your contingency plan to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams. Submit a copy of your revised plan to this office.
4. Revise your contingency plan to include the home addresses of all persons who may assume responsibilities as emergency coordinators. Submit a copy of your revised plan to this office.
5. Ensure transportation of the hazardous waste to a permitted facility by a person who has notified the U.S. EPA as a hazardous waste transporter. If the waste is a liquid, then the transporter must also have a valid Liquid Industrial Waste Hauler's Permit as required by 330 IAC 4-10. All future hazardous waste generated by your Company must not be stored for more than ninety (90) days.

Your Company shall submit to this office, within thirty-five (35) calendar days of receipt of this letter, a written detailed explanation of the steps taken to achieve compliance. The letter shall state the date compliance was achieved.

Failure to adequately respond to this Notice of Violation and verify a return to compliance at this facility will result in escalated enforcement action.

Please direct your response to this letter and any questions to Mr. Robert Malone of this Division at AC 317/243-5052.

Very truly yours,

A handwritten signature in dark ink, appearing to read "David D. Lamm", written in a cursive style.

David D. Lamm, Director
Division of Land Pollution Control

RDM/tr

cc: Tippecanoe County Health Department
Ms. Sally K. Swanson, U.S. EPA, Region V
Mr. Thomas O'Leary

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

September 17, 1985

Ms. Sharon Huey
Rea Magnet Wire Company
3600 East Pontiac Street
Fort Wayne, IN 46896

Dear Ms. Huey:

Re: Container/Storage Closure
(EPA Policy #121)
Rea Magnet Wire Company
IND 005478219

This is to acknowledge your telephone call requesting that the above-referenced facility be considered a generator of hazardous waste only with accumulation of those wastes on-site for fewer than 90 days in compliance with 40 CFR 262.34.

Based on this agency's information, however, the facility has stored hazardous wastes for longer than 90 days at some time since November 19, 1980. Therefore, the facility is subject to the closure requirements in 40 CFR 265, Subpart G, and 320 IAC 4-7-1. Your obligations under these requirements may be satisfied by completing the enclosed "container/storage closure request," having it signed by an appropriate individual per 40 CFR 270.11, and submitting it to the following address:

Mr. Ralph C. Pickard
Technical Secretary
Indiana Environmental Management Board
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

The request (plan) will be reviewed by staff of the Division of Land Pollution Control and public noticed in a newspaper local in your area. Upon completion of the public comment period, you will be notified of the Technical Secretary's decision in writing.

-2-

If you have any questions in regard to this matter, please contact Mr. Reggie Baker of my staff at AC 317/243-5092.

Very truly yours,

Terry F. Gray

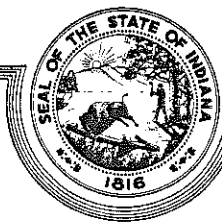
Terry F. Gray, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Division of Land Pollution Control

ROB/sk

Enclosure

cc: Mr. Ken Burch, U.S. EPA, Region V
Mr. Hak Cho, U.S. EPA, Region V

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

August 26, 1985

VIA CERTIFIED MAIL

Mr. Gary Crouth
Aluminum Company of America
ALCOA Building
Pittsburgh, PA 15219

Dear Mr. Crouth:

Re: REA Magnet Wire Company
Lafayette, Indiana, IND 005478219

Our records indicate that the facility indicated above is not in compliance with the Indiana Resource Conservation and Recovery Act (RCRA) financial assurance rules for the following reasons:

No current 1985 update of your corporate guarantee letter.

No filing of proof of insurance for liability protection for:

Sudden occurrences.

Failure to respond to this notice by September 30, 1985, will result in the referral of this matter to the Enforcement Section. If you have any questions regarding this, please contact Ms. Susan Hyndman, C.P.A., of this office at AC 317/243-5140.

Very truly yours,

Jeffrey W. Stevens

Jeffrey W. Stevens
Environmental Hearing Officer
Division of Land Pollution Control

JWS/sk

cc: Ms. Sally K. Swanson, U.S. EPA, Region V

PERIODIC COMPLIANCE REPORT
FOR 40 CFR 467 ALUMINUM FORMING

SECTION I

1. A. Name: Rea Magnet Wire Co., Inc.
Address: 2800 Concord Road
Lafayette, Indiana 47905

B. Facility Name: Same
Location: _____

(Optional) Number of Employees 160 Number of Shifts 21 Shifts/Wk

2. A. A Baseline Monitoring Report(s) (BMR) ☒ was ☐ was not submitted.
If not submitted, complete applicable sections or submit your own report.

B. The BMR was submitted to:

☒ Local Municipality on 7/24/84
☒ State Agency on 7/24/84
☒ USEPA, Region V on 7/24/84

C. Compliance Progress Reports (CPR) ☐ were ☐ were not submitted.
If not submitted, complete applicable sections or submit your own report.

D. The reports were submitted to:

☒ Local Municipality on 7/17/85
☒ State Agency on 7/17/85
☒ USEPA, Region V on 7/17/85
☐ Most recent update progress report is attached.

Average 23,565 Maximum 25,000 gal/day

Type of Discharge: Batch _____ Continuous X

B. Individual Flows (gallons/day)

	Name of Process Line (Regulated)	Average	Maximum	Discharge
L1	<u>GE oven quench system</u>	<u>229</u>	<u>260</u>	<u>229</u>
L2	<u>MOCO oven quench system</u>	<u>229</u>	<u>260</u>	<u>229</u>
L3	<u>NWT oven quench system</u>	<u>229</u>	<u>260</u>	<u>229</u>
L4	<u>NT oven quench system</u>	<u>229</u>	<u>260</u>	<u>229</u>
	(Non-Regulated)			
	<u>Boiler</u>	<u>1566</u>	<u>1780</u>	<u>1566</u>
	<u>Waste Base Lubricants</u>	<u>616</u>	<u>700</u>	<u>0</u>
	<u>Total Cooling Water</u>	<u>7102</u>	<u>8070</u>	<u>7102</u>
	<u>Total Sanitary Waste</u>	<u>11774</u>	<u>13380</u>	<u>11774</u>

4. Attach schematic showing all regulated processes, associated flows, and point(s) of discharge to the sewerage system. Show location of treatment facilities.

Attachment 1 and Attachment 2

5. Briefly describe wastewater treatment system: Abcor membrane ultrafiltration followed by evaporator and condenser followed by a bacteria degradation system.

6. Briefly describe disposal method of waste products (i.e. pretreatment sludges, chemical by products, etc.)
- Waste Enamels (acid base) Shipped to Rea Magnet Wire Co., Ft. Wayne, IN for reclamation.
 - Waste Enamels (solvent base) Shipped to LWD Calvert, KY for incineration.
 - Enamel, drawing lubricant sludges shipped to LWD, Calvert, KY for incineration.
 - Waste lubricant (water base) shipped to ILWD Indianapolis, In for processing and disposal.
 - Waste Lubricant Oils sold at market value to oil reclaimer Dunauan Oil Service, Oakwood, Illinois.

Compliance Schedule:

Action ItemsCompletion Dates

SECTION III

☒ To the extent allowed by 40 CFR Part 403.14 and 40 CFR Part 2.302 I request the information contained herein be considered confidential information.

A. Qualified Professional Certification:

I hereby certify under penalty of law that this information was obtained in accordance with the applicable procedures and requirements as specified in the General Pretreatment Regulations and amendments thereto. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Harold R. Otis Harold R. Otis Analytical Chemist 86/02/01 219-424-4252
Name (print) Signature Title Date Phone

B. Authorized Representative Statement:

I certify under penalty of law that I have personally examined and I am familiar with the information in this report and all attachments therein. Furthermore, based on my inquiry of those persons immediately responsible for obtaining the information contained in this report, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I further certify that the sampling results reported are representative of normal work cycles and expected pollutant discharges.

Nelson P. Ayala Nelson P. Ayala Technical Manager 2/1/86 317-474-3455
Name (Print) Signature Title Date Phone

NATURE AND CONCENTRATION OF POLLUTANTS

Type of sample taken for analysis GRAB GE Ovens Quench

<u>Parameters</u>	<u>Average mg/l</u>	<u>Maximum mg/l</u>	<u>Number of Samples</u>	<u>Analysis Method</u>
<u>Chromium</u>	<u><.01</u>	<u><.01</u>	<u>3</u>	<u>AA</u>
<u>Cyanide</u>	<u>See Note Below</u>			
<u>Zinc</u>	<u>.029</u>	<u>.162</u>	<u>3</u>	<u>AA</u>
<u>Oil & Grease</u>	<u>1.66</u>	<u>2.0</u>	<u>3</u>	<u>Liquid, liquid, extraction</u>

TTO - used alternate method - oils & grease per 40 CFR 467.03(b)

B. Process Description:

<u>Nature of Operation</u>	<u>Production Rate</u>	<u>Subpart</u>	<u>SIC Code</u>
<u>Solution Heat Treatment</u>		<u>E</u>	<u>3357</u>
<u>Contact cooling Water</u>	<u>* 0</u>		
<u>Core</u>		<u>E</u>	<u>3357</u>

* 1985 Production Rate

Note We do not and will not use cyanide in our manufacturing process;
therefore, we are claiming exemption from testing for cyanide
according to 40 CFR 467.03(a)(2).

NAME Nelson P. Ayala

Signed Nelson P. Ayala

Title Technical Manager

NATURE AND CONCENTRATION OF POLLUTANTS

Type of sample taken for analysis GRAB MOCO Ovens Quench

<u>Parameters</u>	<u>Average mg/l</u>	<u>Maximum mg/l</u>	<u>Number of Samples</u>	<u>Analysis Method</u>
<u>Chromium</u>	<u><.01</u>	<u><.01</u>	<u>3</u>	<u>AA</u>
<u>Cyanide</u>	<u>See Note Below</u>	<u></u>	<u></u>	<u></u>
<u>Zinc</u>	<u><.003</u>	<u><.009</u>	<u>3</u>	<u>AA</u>
<u>Oil & Grease</u>	<u>1.25</u>	<u>2</u>	<u>3</u>	<u>Liquid, liquid, extraction</u>

TTO - used alternate method - oils & grease per 40 CFR 467.03(b)

B. Process Description:

<u>Nature of Operation</u>	<u>Production Rate</u>	<u>Subpart</u>	<u>SIC Code</u>
<u>Solution Heat Treatment</u>		<u>E</u>	<u>3357</u>
<u>Contact cooling Water</u>	<u>* 4,873 lbs/day</u>		
<u>Core</u>		<u>E</u>	<u>3357</u>

* 1985 Production Rate

Note We do not and will not use cyanide in our manufacturing process;
therefore, we are claiming exemption from testing for cyanide
according to 40 CFR 467.03(a)(2).

NAME Nelson P. Ayala

Signed _____

Title Technical Manager

NATURE AND CONCENTRATION OF POLLUTANTS

Type of sample taken for analysis GRAB NWT Oven Quench

Parameters	Average mg/l	Maximum mg/l	Number of Samples	Analysis Method
Chromium	<u><.01</u>	<u><.01</u>	<u>3</u>	<u>AA</u>
Cyanide	<u>See Note Below</u>			
Zinc	<u><.009</u>	<u><.019</u>	<u>3</u>	<u>AA</u>
Oil & Grease	<u>1.25</u>	<u>2</u>	<u>3</u>	<u>Liquid, liquid, extraction</u>

TTO - used alternate method - oils & grease per 40 CFR 467.03(b)

B. Process Description:

Nature of Operation	Production Rate	Subpart	SIC Code
Solution Heat Treatment		E	3357
Contact cooling Water	* 4504 lbs/day		
Core		E	3357

* 1985 Production Rate

Note We do not and will not use cyanide in our manufacturing process;
therefore, we are claiming exemption from testing for cyanide
according to 40 CFR 467.03(a)(2).

NAME Nelson P. Ayala

Signed Nelson P. Ayala

Title Technical Manager

NATURE AND CONCENTRATION OF POLLUTANTS

Type of sample taken for analysis GRAB N Ovens Quench

Parameters	Average mg/l	Maximum mg/l	Number of Samples	Analysis Method
Chromium	<u><.01</u>	<u><.01</u>	<u>3</u>	<u>AA</u>
Cyanide	<u>See Note Below</u>			
Zinc	<u>.029</u>	<u>.061</u>	<u>3</u>	<u>AA</u>
Oil & Grease	<u>1.25</u>	<u>2</u>	<u>3</u>	<u>Liquid, Liquid, extraction</u>

TTO - used alternate method - oils & grease per 40 CFR 467.03(b)

B. Process Description:

Nature of Operation	Production Rate	Subpart	SIC Code
Solution Heat Treatment		E	3357
Contact cooling Water	1,930 lbs/day		
Core		E	3357

Note We do not and will not use cyanide in our manufacturing process;
therefore, we are claiming exemption from testing for cyanide
according to 40 CFR 467.03(a)(2).

NAME Nelson P. Ayala

Signed Nelson P. Ayala

Title Technical Manager

PERIODIC COMPLIANCE REPORT
FOR 40 CFR 468, COPPER FORMING

SECTION I

1. A. Name: Rea Magnet Wire Co., Inc.
Address: 2800 Concord Road
Lafayette, Indiana 47905

B. Facility Name: Same
Location: _____

(Optional) Number of Employees 160 Number of Shifts 21 Shifts/Wk

2. A. A Baseline Monitoring Report(s) (BMR) ☒ was ☐ was not submitted.
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☒ State Agency on 7/24/84
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☐ State Agency on 7/17/85
☐ USEPA, Region V on 7/17/85
☐ Most recent update progress report is attached.

Average 23,565 Maximum 25,000 gal/day

Type of Discharge: Batch _____ Continuous X

B. Individual Flows (gallons/day)

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L3	<u>NWT oven quench system</u>	<u>229</u>	<u>260</u>	<u>229</u>
L4	<u>NT oven quench system</u>	<u>229</u>	<u>260</u>	<u>229</u>
	(Non-Regulated)			
	<u>Boiler</u>	<u>1566</u>	<u>1780</u>	<u>1566</u>
	<u>Waste Base Lubricants</u>	<u>616</u>	<u>700</u>	<u>0</u>
	<u>Total Cooling Water</u>	<u>7102</u>	<u>8070</u>	<u>7102</u>
	<u>Total Sanitary Waste</u>	<u>11774</u>	<u>13380</u>	<u>11774</u>

4. Attach schematic showing all regulated processes, associated flows, and point(s) of discharge to the sewerage system. Show location of treatment facilities.

Attachment 1 and Attachment 2

5. Briefly describe wastewater treatment system: Abcor membrane ultrafiltration followed by evaporator and condenser followed by a bacteria degradation system.

6. Briefly describe disposal method of waste products (i.e. pretreatment sludges, chemical by products, etc.)

- Waste Enamels (acid base) Shipped to Rea Magnet Wire Co., Ft. Wayne, IN for reclamation.
- Waste Enamels (solvent base) Shipped to LWD Calvert, KY for incineration.
- Enamel, drawing lubricant sludges shipped to LWD, Calvert, KY for incineration.
- Waste lubricant (water base) shipped to ILWD Indianapolis, In for processing and disposal.
- Waste Lubricant Oils sold at market value to oil reclaimer Dunauan Oil Service, Oakwood, Illinois.

Compliance Schedule:

Action ItemsCompletion Dates

SECTION III

☒ To the extent allowed by 40 CFR Part 403.14 and 40 CFR Part 2.302 I request the information contained herein be considered confidential information.

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<i>Harold R. Otis</i>	<i>Harold R. Otis</i>	<i>Analytical Chemist</i>	<i>86/02/01</i>	<i>219-424-4252</i>
Name (print)	Signature	Title	Date	Phone

B. Authorized Representative Statement:

I certify under penalty of law that I have personally examined and I am familiar with the information in this report and all attachments therein. Furthermore, based on my inquiry of those persons immediately responsible for obtaining the information contained in this report, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I further certify that the sampling results reported are representative of normal work cycles and expected pollutant discharges.

<i>Nelson P. Ayala</i>	<i>Nelson P. Ayala</i>	<i>Technical Manager</i>	<i>2/1/86</i>	<i>317-474-3455</i>
Name (Print)	Signature	Title	Date	Phone

NATURE AND CONCENTRATION OF POLLUTANTS

Type of sample taken for analysis GRAB GE Ovens Quench

<u>Parameters</u>	<u>Average mg/l</u>	<u>Maximum mg/ 1</u>	<u>Number of Samples</u>	<u>Analysis Method</u>
<u>Chromium</u>	<u><.01</u>	<u><.01</u>	<u>3</u>	<u>AA</u>
<u>Copper</u>	<u>.25</u>	<u>.28</u>	<u>3</u>	<u>AA</u>
<u>Lead</u>	<u><.1</u>	<u><.1</u>	<u>3</u>	<u>AA</u>
<u>Nickel</u>	<u><.01</u>	<u><.01</u>	<u>3</u>	<u>AA</u>
<u>Zinc</u>	<u>.029</u>	<u>.162</u>	<u>3</u>	<u>AA</u>
<u>Oil & Grease</u>	<u>1.66</u>	<u>2.0</u>	<u>3</u>	<u>Liquid- liquid- extraction</u>

TTO - Used alternate method- oils & grease - 40 CFR 468.03 (b)

B. Process Description:

<u>Nature of Operation</u>	<u>Production Rate</u>	<u>Subpart</u>	<u>SIC Code</u>
<u>Solution Heat</u>		<u>A</u>	<u>3357</u>
<u>Treatment Pses</u>	<u>73,689 lbs/day</u>		
<u>Surface Coating Pses</u>		<u>A</u>	<u>3357</u>

NATURE AND CONCENTRATION OF POLLUTANTS

Type of sample taken for analysis GRAB MOCO Ovens Quench

<u>Parameters</u>	<u>Average mg/1</u>	<u>Maximum mg/ 1</u>	<u>Number of Samples</u>	<u>Analysis Method</u>
<u>Chromium</u>	<u><.01</u>	<u><.01</u>	<u>3</u>	<u>AA</u>
<u>Copper</u>	<u>.25</u>	<u>.28</u>	<u>3</u>	<u>AA</u>
<u>Lead</u>	<u><.01</u>	<u><.01</u>	<u>3</u>	<u>AA</u>
<u>Nickel</u>	<u><.01</u>	<u><.01</u>	<u>3</u>	<u>AA</u>
<u>Zinc</u>	<u>.009</u>	<u>.021</u>	<u>3</u>	<u>AA</u>
<u>Oil & Grease</u>	<u>1.25</u>	<u>2</u>	<u>3</u>	<u>Liquid- liquid- extraction</u>

TTO - Used alternate method- oils & grease - 40 CFR 468.03 (b)

B. Process Description:

<u>Nature of Operation</u>	<u>Production Rate</u>	<u>Subpart</u>	<u>SIC Code</u>
<u>Solution Heat</u>		<u>A</u>	<u>3357</u>
<u>Treatment Pses</u>	<u>17,131 lbs/day</u>		
<u>Surface Coating Pses</u>		<u>A</u>	<u>3357</u>

NATURE AND CONCENTRATION OF POLLUTANTS

Type of sample taken for analysis GRAB NWT Ovens Quench

<u>Parameters</u>	<u>Average mg/l</u>	<u>Maximum mg/ l</u>	<u>Number of Samples</u>	<u>Analysis Method</u>
Chromium	<.01	<.01	3	AA
Copper	.16	1.8	3	AA
Lead	<1	<1	3	AA
Nickel	<.01	<.01	3	AA
Zinc	<.009	.019	3	AA
Oil & Grease	1.25	2	3	Liquid- liquid extraction

TTO - Used alternate method- oils & grease - 40 CFR 468.03 (b)

B. Process Description:

Nature of Operation	Production Rate	Subpart	SIC Code
Solution Heat		A	3357
Treatment Pses	13,673 lbs/day		
Surface Coating Pses		A	3357

NATURE AND CONCENTRATION OF POLLUTANTS

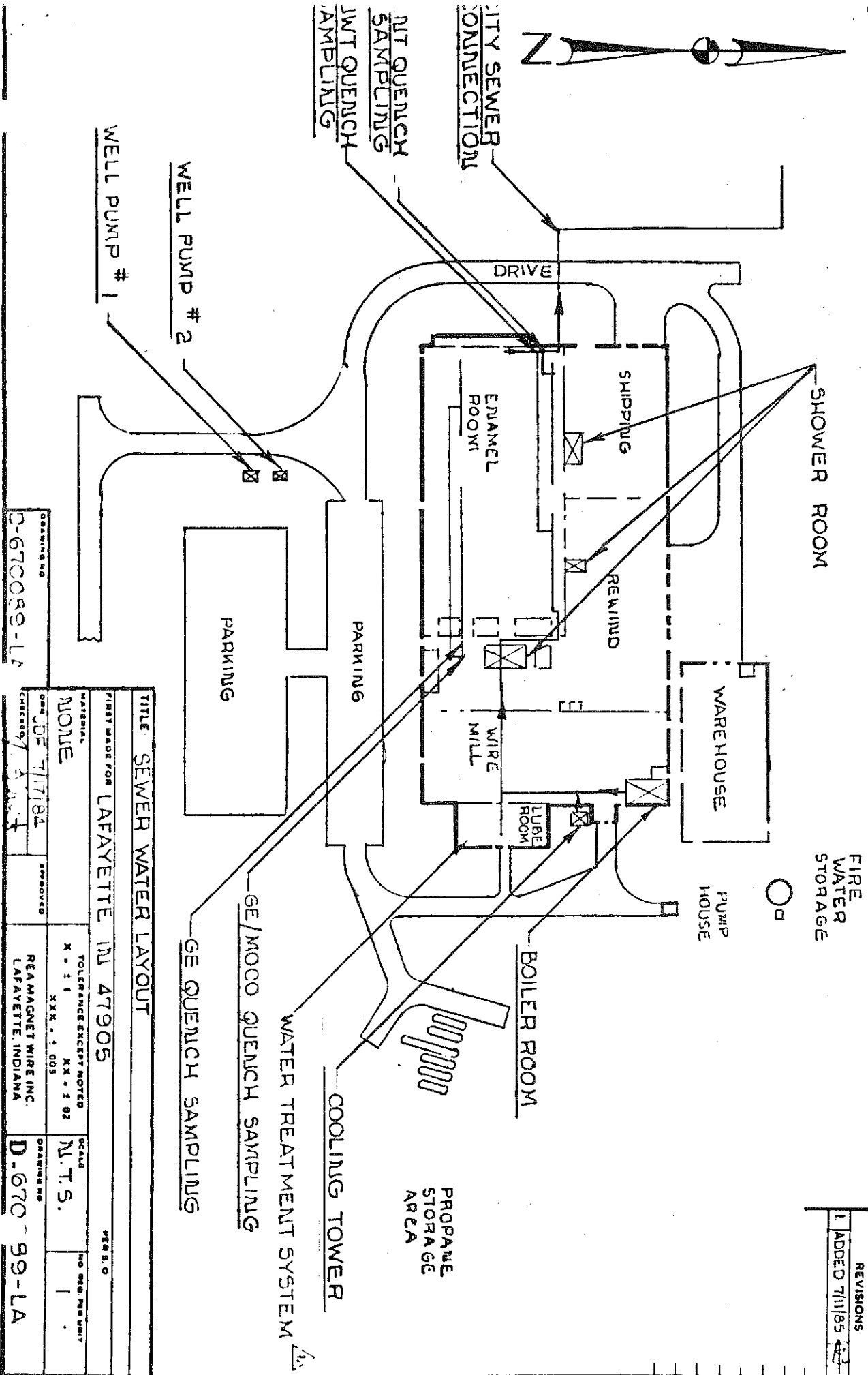
Type of sample taken for analysis GRAB N Ovens Quench

<u>Parameters</u>	<u>Average mg/1</u>	<u>Maximum mg/ 1</u>	<u>Number of Samples</u>	<u>Analysis Method</u>
Chromium	<.01	<.01	3	AA
Copper	.22	.34	3	AA
Lead	<.01	<.01	3	AA
Nickel	<.01	<.01	3	AA
Zinc	.029	.061	3	AA
Oil & Grease	1.25	2	3	Liquid- liquid extraction

TTO - Used alternate method- oils & grease - 40 CFR 468.03 (b)

B. Process Description:

<u>Nature of Operation</u>	<u>Production Rate</u>	<u>Subpart</u>	<u>SIC Code</u>
Solution Heat		A	3357
Treatment Pses	5,860 lbs/day		
Surface Coating Pses		A	3357



DRAWING NO
C-67C089-LA

TITLE SEWER WATER LAYOUT			
FIRST MADE FOR LAFAYETTE IND 47905			
MATERIAL		TOLERANCE EXCEPT NOTED	
NONE		X = 1/8" XX = 1/32" XXX = .005	
DATE 7/17/84	APPROVED	REAGMAGNET WIRE INC. LAFAYETTE, INDIANA	
CHGNO 7	DATE 7/17/84	DRAWING NO. D-67C-99-LA	REVISED

REVISIONS	
1	ADDED 7/11/85

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

JUN 21 1982

Mr. Allan Knoll
Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
Fort Wayne, IN 46896

Dear Mr. Knoll:

Re: Letter of May 17, 1982
from Mr. T. A. Shelby

This letter confirms the receipt of the above-referenced letter requesting additional time to comply with violations noted during the RCRA interim status inspections conducted by Mr. J. T. Fitch of our staff. Mr. Fitch conducted an interim status inspection of the plant located at 3600 East Pontiac Street, Fort Wayne, on November 20, 1981. He also conducted an interim status inspection of the plant in Lafayette, Indiana, on December 4, 1981. The Notices of Violation for each inspection were sent out on January 4, 1982. At that time, Rea Magnet Wire Company was given 30 days to come into compliance. On February 8, 1982, you requested and were given an extension of time until April 1, 1982, to issue your responses to the Notice of Violation and submittal of Indiana Hazardous Waste Annual Reports for each plant. On May 11, 1982, you were sent a letter stating that the above-mentioned responses to the Notice of Violation had not yet been received, and if not received within seven days, appropriate enforcement action would be initiated. On May 17, 1982, a letter was received by this office relaying that full compliance with the Notices of Violation had not yet been completed.

It has now been 192 days since the interim status inspection was conducted at the Pontiac Street Plant in Fort Wayne and 178 days since the inspection was completed in Lafayette. Therefore, it is the decision of this agency to turn this matter over to the Attorney General's Office for enforcement action.

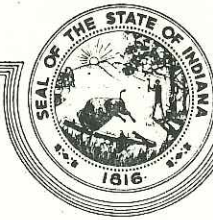
Very truly yours,

Ralph C. Pickard
Technical Secretary

JTFitch/ds

cc: Ronald Foster, Rea Magnet Wire Company
Brenda Rodeheffer, Attorney General's Office
Richard Shandross, Region V, U.S. EPA ✓

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206

MAY 11 1982

VIA CERTIFIED MAIL

Mr. T. A. Shelby
Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
Fort Wayne, IN 46896

Dear Mr. Shelby:

Re: Rea Magnet Wire Company, Inc., Inspection
Lafayette, Indiana

This letter is in reference to our Notice of Violation letter of January 4, 1982, concerning an inspection of your Company conducted by J. Thomas Fitch on December 4, 1981.

You were requested to achieve compliance with the requirements of 40 CFR 265.13(a)(1), 265.15(b), 265.16(d)(3), 265.52(a), 265.52(c), 265.73(a), 265.73(b)(3), 265.142(a), 265.14(c), 265.15(d), 265.17(a), 265.52(c), 265.53, 265.73(b)(1), 265.73(b)(7), 265.174, 265.15(b), 265.16(d)(2), 265.33, 265.52(d), 265.55, 265.73(b)(2), 265.112(a) and 320 IAC 4-6-1 within 30 days and to submit a written, detailed explanation of the steps taken to achieve compliance to this office within 35 days.

We have not received any correspondence from your Company indicating that you have complied with our requirements as of the date of this letter. If we do not receive a written, detailed explanation of the steps you have taken to achieve compliance within seven days of receipt of this letter, we will initiate appropriate enforcement action.

If you have any questions, please contact J. Thomas Fitch at the Indiana State Board of Health, 317/633-0215, or Mr. Richard Shandross, U.S. EPA, 312/886-6146.

Very truly yours,

Guinn Doyle, Chief
Hazardous Waste Management Branch
Division of Land Pollution Control

JTF/tr

Enclosure

cc: Mr. Richard Shandross, U.S. EPA

PG #1

ISS FILE AUDIT REVIEW FORM

Facility: Rea Magnet Wire Co
ID#: IND 005478219
Address: 2800 Concord Rd
Lafayette IN

Reviewer: _____
Date: 5-13-82

Date of Inspection: 12-4-81

Violation Classification: I III

State Action & Date: warning letter sent 1-4-82

Facility Response & Date:

Additional Info in EPA File:

G- TSD

Info Needed from State File:

facility response. compliance status, state followup

Info Found in State File:

for St Wayne facility also
facility response requesting more time to answer (2-8-82)
State letter granting extension until April 1, 1982
but nothing further

6-2-82

State second warning 5-11-82

Disposition:

close out

✓ discuss with State

refer for EPA enforcement

Comments:

INSPECTION REVIEW FORM

PG #2

NAME OF FACILITY: Red Magnet Wine Co., Inc.ID NO. IND005478219LOCATION: ^{mailing} (Address): 3600 E. Pontiac St. ^{Facility} 2800 Concord Rd.
Pt. Wayne, IN 46896 Lafayette, INOPERATION: ☒ G ☐ T ☒ TSD
(Circle Appropriate)INSPECTOR ☒ S ☐ F ☐ JDATE OF INSPECTION: 12-4-81NAME OF REVIEWER & DATE: SK Swanson 3-23-82COMPLIANCE STATUS
(circle one) ☐ IN ☒ OUTVIOLATION CLASSIFICATION: None ☒ I ☐ II ☒ IIISTATE ACTION: State sent warning letter 1-4-82
Second warning letter 5-11-82See PG #3

RECOMMENDED ACTION:

NONE ☒ MONITOR STATE ☐ LETTER ☐ ADMINISTRATIVE COMPLAINT ☐ REFERRAL

ASSIGNEE: _____

DATE ASSIGNED: _____

cc: Unit Inspection Log

INSPECTION REVIEW FORM

PG # 3

ID NO.: IND005478219

FACILITY NAME: Rea Magnet Wire Company, Inc.

LOCATION: 2800 Concord Rd
Safayette, Ind 47905

OPERATION: G T TSD INSPECTOR: S E J

DATE OF INSPECTION: _____ TYPE OF INSPECTION: 1. CEI 2. CSI

NAME OF REVIEWER: L. Davis DATE: 11/9/82

COMPLIANCE STATUS: IN OUT NON-REG

VIOLATION CLASS: NONE I II III facility

ACTION: State sent letter to 6/21/82 recommending
enforcement action will be taken.

RECOMMENDED EPA ACTION: NONE MONITOR STATE LETTER ADM. COMPLAINT REFERRAL

DATE REFERRED TO UNIT CHIEF: _____

ASSIGNEE: _____ DATE ASSIGNED: _____

ENFORCEMENT ACTIONS

TYPE	ENFORCEMENT ACTION		STATUS		PENALTY		STATE OR EPA	LINK	RESP. PERSON	ATTORNEY CODE
	ISSUED	DUE	CODE	DATE	ASSESS	COLLECT				
3	1/4/82	2/5/82	A	1/4/82	.	.	S.	Idol		
3	5/11/82	5/19/82	A	5/11/82	.	.	S.	Idol		
3	6/21/82	5/19/82	A	6/21/82	.	.	S.	Idol		



Sally

Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
Fort Wayne, Indiana 46896
219 424-4252

1982 February 8

Mr. Ralph Pickard
Indiana State Board of Health
1330 West Michigan Street
P.O. Box 1964
Indianapolis, Indiana 46206

RE: State Forms and Inspection Responses

Dear Mr. Pickard:

I handle all environmental affairs (including air, water, waste, hygiene, etc.) for all Rea Wire locations, and I am finding that governmental requests come to me in large quantities during some months. February of 1982 seems to be a very popular month for requests from Indiana as well as other locations. Most requests are not a major problem because I can complete the NPDES permit forms, air items, some of our hygiene needs and maybe even some federal report requests, but the extra requests for RCRA make it impossible for me to complete everything in February. Therefore, I am asking for more time to complete some of your requests.

I believe I can complete your annual report and other recommendations for our Adams Center Road plant during the first part of February. The Fort Wayne plant annual report and our answer to your RCRA inspection violation letter should be completed and sent to you by the end of February. (Inspection letter answer is due in mid-February). The Lafayette plant's annual report and our answer to your RCRA inspection violation letter can then be completed and sent in late March. (Annual report due March 1 and violation letter due in late February). Mr. Thomas Fitch, of your office, was the inspector for two of our Indiana plants and is knowledgeable of my request to you. I also have similar reports and requests from other states to complete during this same time period.

Thank you for considering my request for a time extension.

Sincerely,

REA MAGNET WIRE COMPANY, INC.

T.A. Shelby

T.A. Shelby
Technical Mgr. - Environmental & Hygiene

cc: Rick Shandross - Region V
Arnold Leder - Region V
Thomas Fitch - Ind.
Richard Strong - Ind.
Al Knoll

TAS/eb

RECEIVED

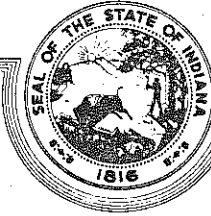
FEB 16 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

RECEIVED
2/16/82

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

JAN 04 1982

Mr. T. A. Shelby, Manager
Chemical Services
Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
Fort Wayne, IN 46896

RECEIVED
JAN 10 1982
WASTE MANAGEMENT BOARD
EPA REGION V

Dear Mr. Shelby:

Re: RCRA G/TSD Inspection
IND 005478219
Rea Magnet Wire Company, Inc.
Lafayette, Indiana

The Environmental Management Board is cooperating with the U.S. Environmental Protection Agency, Region V, in carrying out the provisions of the Resource Conservation and Recovery Act, Public Law 94-580 (RCRA). In this effort, representatives of the Environmental Management Board are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, storage, treatment, or disposal of hazardous waste.

This letter is to inform you that on December 4, 1981, an inspection of Rea Magnet Wire Company, Inc., located at 2800 Concord Road, Lafayette, Indiana, was conducted by Mr. J. Thomas Fitch of the Division of Land Pollution Control, Indiana State Board of Health. Mr. John Neff and you represented your firm at this inspection.

The following concerns pertaining to the operation of your facility were noted:

- | | |
|---------------------|--|
| 40 CFR 265.13(a)(1) | Owner or operator has not obtained a detailed chemical and physical analysis of the waste. |
| 40 CFR 265.14(c) | Danger sign(s) not posted at entrance to facility. |
| 40 CFR 265.15(b) | Owner or operator inspections do not include a written schedule for inspections. |

- | | |
|---------------------|--|
| 40 CFR 265.15(b) | Owner or operator inspections do not include the inspection of safety and emergency equipment. |
| 40 CFR 265.15(b) | Owner or operator inspections do not include security devices. |
| 40 CFR 265.15(b) | Owner or operator inspections do not include the inspection of operating and structural devices. |
| 40 CFR 265.15(d) | Owner or operator does not record inspections in an inspection log. |
| 40 CFR 265.16(d)(2) | Personnel training records do not include job descriptions. |
| 40 CFR 265.16(d)(3) | Personnel training records do not include a description of personnel training. |
| 40 CFR 265.16(d)(4) | Personnel training records do not include records of personnel training. |
| 40 CFR 265.17(a) | "No Smoking" signs are not on premises where required. |
| 40 CFR 265.33 | Owner or operator has not established testing and maintenance procedures for emergency equipment. |
| 40 CFR 265.52(a) | The Contingency Plan does not describe the actions facility personnel must take to comply with regulations. |
| 40 CFR 265.52(c) | The Contingency Plan does not describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams. |
| 40 CFR 265.52(d) | The Contingency Plan does not list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators. |

- | | |
|---------------------|---|
| 40 CFR 265.52(e) | The Contingency Plan does not include a list of all emergency equipment at the facility, location of equipment, physical description of each item on the list, and a brief outline of its capabilities. |
| 40 CFR 265.53 | Copies of the Contingency Plan are not on file at the site and local emergency organizations. |
| 40 CFR 265.55 | Facility Emergency Coordinator is not identified. |
| 40 CFR 265.73(a) | A written operating record is not maintained as required. |
| 40 CFR 265.73(b)(1) | A description and the quantity of each hazardous waste received and the method(s) and date(s) of each waste's treatment, storage, or disposal not in operating record. |
| 40 CFR 265.73(b)(2) | The location and quantity of each hazardous waste within the facility is not maintained in operating record. |
| 40 CFR 265.73(b)(3) | Records and results of all waste analyses, trial tests, monitoring data, and operator inspections not in operating record. |
| 40 CFR 265.73(b)(7) | Operating record does not contain all closure and post-closure costs as applicable. |
| 40 CFR 265.112(a) | Closure plan not available for inspection by May 19, 1981. |
| 40 CFR 265.142(a) | Closure estimate not available by May 19, 1981. |
| 40 CFR 265.174 | Containers are not inspected weekly for leaks and deterioration. |

The owner/operator, within 30 days of receipt of this letter, shall achieve compliance with the following requirements:

1. The owner or operator will obtain a detailed chemical and physical analysis of waste generated.

2. Danger signs will be posted at the entrances to the facility.
3. The owner or operator inspections will include a written schedule for inspections.
4. The owner or operator inspections will include the inspection of safety and emergency equipment.
5. The owner or operator inspections will include security devices.
6. The owner or operator inspections will include the inspection of operating and structural devices.
7. The owner or operator will record inspections in an inspection log.
8. Personnel training records will include job descriptions of those persons engaged in hazardous waste management.
9. Personnel training records will include a description of personnel training.
10. "No Smoking" signs will be posted on the premises as required.
11. The owner or operator shall establish testing and maintenance procedures for emergency equipment.
12. The Contingency Plan will describe the actions facility personnel must take to comply with regulations.
13. The Contingency Plan will describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams.
14. The Contingency Plan will list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators.
15. The Contingency Plan will include a list of all emergency equipment at the facility, location of the equipment, physical description of each item on the list, and a brief outline of its capabilities.
16. Copies of the Contingency Plan will be on file at the site and with local emergency organizations.
17. The facility emergency coordinator shall be identified.
18. A written operating record shall be maintained as required.


19. A description and the quantity of each hazardous waste received and the method and dates of each waste treatment, storage, or disposal shall be maintained in the operating record.
20. The location and quantity of each hazardous waste within the facility is to be maintained in the operating record.
21. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections shall be maintained in an operating record.
22. The operating record shall contain all closure and post-closure costs as applicable.
23. A closure plan shall be made available for review.
24. A closure estimate will be available.
25. Containers shall be inspected weekly for leaks and deterioration.

The owner/operator shall submit to this office, within 35 days of receipt of this letter, a written detailed explanation of the steps taken to achieve compliance. The letter shall state the date compliance was achieved. A copy of this letter of explanation shall also be submitted to Mr. Arnold Leder, Chief, Compliance Section, U.S. EPA, 5EWHME, 230 South Dearborn Street, Chicago, Illinois 60604.

A copy of this letter and the inspection report will be sent to the U.S. EPA's office in Chicago. Any enforcement action related to this inspection will be initiated by the U.S. EPA's Enforcement Division; in that case, EPA will contact you.

If you have any questions, please contact Mr. J. Thomas Fitch at the Indiana State Board of Health, 317/633-0215, or Mr. Richard Shandross, U.S. EPA, 312/886-6146.

Very truly yours,


Ralph C. Pickard
Technical Secretary

JTF/tr

Enclosure

cc: Mr. Richard Shandross, U.S. EPA
Mr. Arnold Leder, U.S. EPA
Aluminum Company of America, Pittsburg

STATE IDENTIFICATION NUMBER
(If Applicable)

IND005478219
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Rea Magnet Wire Company Inc
(B) Street: 2800 Concord Road
(C) City: Lafayette (D) State: Ind (E) Zip Code: 47905
(F) Phone: 317 474 3458 (G) County: Tippecanoe
(H) Operator: T.A. Shelby Mgr. Chemical SVC Rea Magnet Wire Company
(I) Street: 3600 East Pontiac Street
(J) City: East Wayne (K) State: Ind (L) Zip Code: 46896
(M) Phone: 1-219-424-4252 (N) County: Allen
(O) Owner: Aluminum Company of America
(P) Street: 1501 Alcoa Building
(Q) City: Pittsburgh (R) State: Pn (S) Zip Code: 15219
(T) Phone: 412-533-4545 (U) County: Allegheny
(V) Date of Inspection: 12-4-81 (W) Time of Inspection (From) 10:30 am (To) 1:30 pm
(X) Weather Conditions: Overcast windy cold 35° F

MAR 19 9 42 AM '81
DEPT. OF HEALTH
STATE OF INDIANA

(Y) Person(s) Interviewed	Title	Telephone
<u>T. A. Shelby</u>	<u>Mgr. Chemical Svc</u>	<u>219-424-4252</u>
<u>John Neff</u>		<u>317-474-3458</u>
(Z) Inspection Participants	Agency/Title	Telephone
<u>J. Thomas Fitch</u>	<u>ESBH / Sandston III</u>	<u>317 633 0215</u>
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>J. Thomas Fitch</u>	<u>ESBH / Sandston III</u>	<u>317 633 0215</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <input checked="" type="checkbox"/> <u>A</u> Storage and/or Treatment | <input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P) |
| <input checked="" type="checkbox"/> ① Containers (I) | |
| <input checked="" type="checkbox"/> JF ● Tanks (J) | <input type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q) |
| 3. Surface Impoundments (K) | |
| 4. Waste Piles (L) | |
| <input type="checkbox"/> B. Land Treatment (M) | |
| <input type="checkbox"/> C. Landfills (N) | |

* They had acted as a container and tank storage facility, but only store in containers.

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	✓	—	_____
2. Facility expansion?	—	✓	—	_____
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	—	✓	—	<i>testing is done at Ft. Wayne Plant but expressed the analysis cannot be at this facility.</i>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	<i>See explanation above. 90% of wastes are known. Others tested at the Ft. Wayne Plant.</i>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	✓	—	<i>N/A they don't take off-site shipments</i>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	_____
2. Artificial or natural barrier around facility?	✓	—	—	_____
3. Controlled entry?	✓	—	—	_____
4. Danger sign(s) at entrance?	—	✓	—	<i>these shall be installed</i>
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	✓	—	_____
2. Records of operator error?	—	✓	—	_____
3. Records of discharges?	—	✓	—	_____

*Not Inspected

III. GENERAL FACILITY STANDARDS - continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	-----
5. Safety, emergency equipment?	---	✓	---	-----
6. Security devices?	---	✓	---	-----
7. Operating and structural devices?	---	✓	---	-----
8. Inspection log?	---	✓	---	-----
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓	---	---	names to be included -----
2. Job descriptions?	---	✓	---	-----
3. Description of training?	---	✓	---	-----
4. Records of training?	---	✓	---	-----
5. Have facility personnel received required training by 5-19-81?	---	---	✓	-----
6. Do new personnel receive required training within six months?	---	---	✓	-----
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	---	---	-----
2. No smoking signs?	---	✓	---	-----
3. Separation and protection from ignition sources?	✓	---	---	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI* Remarks

✓ — —

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

✓ — —

2. Telephone or 2-way radios at the scene of operations?

✓ — —

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓ — —

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

— ✓ —

2. Is emergency equipment maintained in operable conditions?

✓ — —

testing done in-house by plant personnel according to mfg. recommendations, to include emergency equipment in drive only extinguishers and fire control equipment now

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

✓ — —

(E) Is there adequate aisle space for unobstructed movement? ✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

 ✓

 ✓

 ✓

 ✓

 ✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	—	✓	—	—
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	—	✓	—	—
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓	—	—	—
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓	—	—	—
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	—	—	✓	—

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	—	—	✓	Nothing taken from site
2. Are records of past shipments retained for 3 years?	—	—	✓	—
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	—	—	✓	—

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

— ✓ —

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

— ✓ —

- c. The location and quantity of each hazardous waste within the facility?

— ✓ —

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — ✓

N/A

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

— ✓ —

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

— ✓ —

No incidents have occurred

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

— ✓ —

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u> </u>	<u> ✓ </u>	<u> </u>	<u>There is none</u>
2. Has this plan been submitted to the Regional Administrator	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
3. Has closure begun?	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
4. Is closure estimate available by May 19, 1981?	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	<u> </u>	<u> </u>	<u> ✓ </u>	<u>N/A only storage facility</u>

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: <u>Ree Maged</u>	Date of Inspection: <u>12-4-81</u>			
	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. Are containers compatible with waste in them?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
3. Are containers stored closed?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
4. Are containers managed to prevent leaks?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
5. Are containers inspected weekly for leaks and defects?	<u> </u>	<u>✓</u>	<u> </u>	<u>Inspected but not documented</u>
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	✓	N/A
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	✓	N/A

J
TANKS

Facility Name: Rea Magnet

Date of Inspection: 12-4-81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	---	---	---	-----
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	---	-----
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	-----
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	-----
5. Are required daily and weekly inspections done?	---	---	---	-----
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----

Yes No NI* Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

L
WASTE PILES

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

M

LAND TREATMENT

Facility Name: _____ Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	-----
**2. Collection of run-off from active portions of the fill?	---	---	---	-----
**3. Is collected run off treated?	---	---	---	-----
4. Control of wind dispersal of hazardous waste?	---	---	---	-----
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	-----
2. The contents of each cell and the location of each hazardous waste type within each cell?	---	---	---	-----
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	-----
2. Has this plan been submitted to the Regional Administrator?	---	---	---	-----
3. Has closure begun?	---	---	---	-----
4. Is closure cost estimate available by 5-19-81?	---	---	---	-----
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
	---	---	---	-----

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	_____	_____	_____	_____
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

Yes No NI* Remarks

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

B. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____

2. _____

3. _____

4. _____

5. _____

III. Monitoring and Inspections

Yes No NI* Remarks

A. Are combustion/emission control instruments monitored at least every 15 minutes?

B. Is steady state maintained or corrections attempted?

C. Is stack plume observed at least hourly for normal color and opacity?

D. Did any stack observations made by owner or operator show a plume different than normal?**

E. If yes to D above, were corrections made to return emissions to normal appearance?**

F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

G. Are emergency shutdown controls and system alarms checked daily for proper operation?

*Not Inspected

**Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others		
0 to 100.....	204 m	670	ft
101 to 1,000.....	380 m	1,250	ft
1,001 to 10,000.....	530 m	1,730	ft
10,001 to 30,000.....	690 m	2,260	ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	_____	_____	_____	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	_____	_____	_____	

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	✓	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓	___	___	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>Not needed</i>

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>not needed</i>

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
--	--------------------------	--------------------------	--------------------------	--

(If answered Yes, complete the following as applicable.)

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|--|
| 1. Exporting Hazardous waste, has a generator: | | | | |
| a. Notified the Administrator in writing? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| c. Met the Manifest requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. Importing Hazardous Waste, has the generator: | | | | |
| Met the manifest requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	_____	_____	_____	_____
B. Are signed completed manifest(s) on file?	_____	_____	_____	_____

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	_____	_____	_____	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

**D. Corrective
Action**



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Mr. Peter P. von Stein, P. E.
Technical Manager
Rea Magnet Wire Division
2800 Concord Road
Lafayette, IN 47909

November 23, 2010

Dear Mr. von Stein:

Re: Notice of Corrective Action
Complete Without Controls
Rea Magnet Wire Division
2800 Concord Rd
Lafayette, Indiana
Tippecanoe County
EPA ID No. IND005478219

Based on documents available to the Office of Land Quality, Indiana Department of Environmental Management (IDEM), it has been determined that Rea Magnet Wire Division has fulfilled its obligations under Indiana's RCRA Corrective Action Program, and is hereby issuing this Notice of Corrective Action Complete Without Controls.

The Statement of Basis was Public Noticed on August 9, 2010, and no public comments were received. The enclosed Corrective Action Final Decision is hereby issued by IDEM.

Thank you for your cooperation in this matter. If you have any questions or comments, please feel free to contact Chris L. Myer at 317/233-4625.

Sincerely,

Victor P. Windle, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

cc: Tippecanoe County Health Department (with enclosures)
The Honorable Tony Roswarski, Mayor, Lafayette (with enclosures)
Mr. George Hamper, U.S. EPA, Region V (with enclosures)
Mr. Hak Cho, U.S. EPA, Region V (with enclosures) ✓
Mr. Michael E. Sickels, IDEM (with enclosures)
Mr. Chris Myer, IDEM (with enclosures)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
RCRA CORRECTIVE ACTION PROGRAM**

FINAL DECISION

Rea Magnet Wire Division

2800 Concord Road

Lafayette, Indiana

IND 005478219

I. INTRODUCTION

This Final Decision is issued by the Indiana Department of Environmental Management (IDEM), under the Resource Conservation and Recovery Act (RCRA) Corrective Action Program. IDEM public noticed the Statement of Basis for Rea Magnet Wire Division, 2800 Concord Road, Lafayette, Indiana 47909, in the Journal & Courier, on August 9, 2010, requesting comments on the proposed final remedy for this facility. The public comment period ran from August 9, 2010 to September 24, 2010. No comments were received.

The Statement of Basis for Rea Magnet Wire Division discussed the investigation activities approved by IDEM for the site and IDEM's determination of no further action at this time.

II. FACILITY BACKGROUND

This facility was built from 1958 through 1961 by Rea Magnet. Prior to 1958 the land use was agricultural. Aluminum Company of America (Alcoa) purchased the Rea Magnet Wire Company, Inc. on January 18, 1958. In 1982, several Rea Magnet managers purchased Rea Magnet from Alcoa and formed a private corporation. The facility was expanded in 1965, 1967, and again in the late 1990's.

Rea Magnet manufactures enamel-coated copper, aluminum and brass magnet wire for various industries. The wire ranges from 7 gauge to 34 gauge. The wire is drawn through a series of diamond and carbide dies, reducing the diameter of the wire to customer specifications. Water-based and oil based lubricants are used in the drawing process.

Hazardous waste streams are managed in 20 Hazardous Waste Accumulation Areas known as Solid Waste Management Units (SWMU) and six (6) Areas of Concern (AOC) within the Rea Magnet facility.

III. SUMMARY OF THE PROPOSED REMEDY

The Statement of Basis proposed issuance of a Corrective Action Complete Without Controls status to Rea Magnet Wire Division Lafayette facility. "Without Controls" implies that no land use restrictions (institutional controls) will be required, and that no contamination will be left on-site that requires the use of any engineered controls to prevent unacceptable human health or ecological exposures.

IV. FINAL DECISION

Based on known information as contained in the administrative record, IDEM has determined this site has fulfilled its obligations under Indiana's RCRA Corrective Action, and hereby issues a Corrective Action Complete Without Controls status to Rea Magnet Wire Division, Lafayette, Indiana.

The administrative record is available for review at the IDEM's Virtual File Cabinet, which is found at <http://www.in.gov/idem/>. VFC document numbers are provided in Section VII. REFERENCES (below).

VII. REFERENCES

IDEM RCRA Assessment Report, dated May 18 2010, VFC # 5561662

RCRA Assessment Report, dated June 2, 2009, VFC# 55912367

Preliminary Assessment/Visual Site Inspection, Rea Magnet Wire Company, Inc, IND 005 478 219, dated July 22, 1992, VFC # 56834944

RCRA Corrective Action Program Statement of Basis for the Rea Magnet Wire Division Lafayette, IN, dated July 27, 2010, VFC # 57022127



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

D12.1

The Honorable Tony Roswarski, Mayor
20 N. 6th Street
Lafayette, IN 47901

July 27, 2010

Mayor Roswarski:

Re: Rea Magnet Wire Division
Lafayette, Indiana
U. S. EPA ID # 005 478 219
Completion of RCRA Corrective Action

Under the Resource Conservation and Recovery Act (RCRA), all permitted and interim status hazardous waste treatment, storage, or disposal facilities are required to conduct corrective action for any releases of hazardous wastes or hazardous constituents at or from their facilities.

On November 10, 1980, Rea Magnet Wire Division located at 2800 Concord Avenue, Lafayette, Indiana, obtained interim permit status for the storage of hazardous waste in containers. The hazardous waste container storage area was certified closed on June 28, 1986. Rea Magnet Wire Division is currently classified as a large quantity hazardous waste generator.

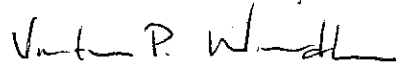
Based upon a file search of the administrative record, a site visit evaluation conducted on October 17, 2008, and soil investigation conducted on March 11, 2010, it has been determined the Solid Waste Management Units (SWMUs) or Areas of Concern (AOC) remaining at the site require no further action. Therefore, The Indiana Department of Environmental Management (IDEM) is proposing that a Completion of RCRA Corrective Action Without Controls status be issued to Rea Magnet Wire Division. "Without Controls" implies that land use restrictions (e.g. environmental restrictive covenants) will not be required, and that no contamination will be left on-site that requires the use of an engineered control to prevent unacceptable human health or ecological exposures.

IDEM is now providing public notice of this determination, and soliciting public comment. The public is encouraged to comment on any aspect of the corrective action Statement of Basis (enclosed) and the determination of Completion of RCRA Corrective Action Without Controls status for the Rea Magnet Wire Division location.

As part of our RCRA Corrective Action Completion Determination process, we notify local government officials of our proposed actions and encourage them to review and comment if there are any concerns. Please review the enclosed Statement of Basis for Rea Magnet Wire Division, which summarizes the activities that have been conducted and the basis for our determination that corrective action is now complete. A Public Notice (copy enclosed) will be published in the Journal & Courier on August 9, 2010, informing the public of the availability of the Statement of Basis and supporting administrative record via the IDEM Virtual File Cabinet, accessible via the internet.

If you have any questions regarding this matter, please call (800) 451-6027, press 0, and ask for Chris L. Myer at extension 3-4625, or call him directly at 317/233-4625; or by e-mail cmoyer@idem.IN.gov.

Sincerely,



Victor P. Windle, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

Enclosures

cc: Mr. Hak Cho, U. S. EPA, Region 5 (without enclosures) ✓
Tippecanoe County Health Department (with enclosures)
Mr. Peter P. von Stein, P.E., Rea Magnet Wire Division (with enclosures)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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July 27, 2010

RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS

Rea Magnet Wire Division

2800 Concord Avenue

Lafayette, Indiana

U.S. EPA ID. IND 005 478 219

I. INTRODUCTION

This Statement of Basis is issued by the Indiana Department of Environmental Management (IDEM), under the authority of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA), 42 U.S.C. §6901 *et seq.*, and United States Environmental Protection Agency (U.S. EPA) regulations at Title 40 of the Code of Federal Regulations (CFR), Parts 260-271 and Part 124, as adopted by reference or required under Indiana Code (IC) 13, and Indiana Administrative Code (IAC) 329 IAC 3.1; regarding Rea Magnet Wire Division, 2800 Concord Avenue, Lafayette, Indiana 47909. IDEM has determined that no further RCRA corrective action is necessary for any of the identified Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at this facility.

IDEM is issuing this Statement of Basis as part of its public participation responsibilities under RCRA Corrective Action Program guidance, and is using the administrative procedures found in 40 CFR Part 270 as adopted by reference, to provide public notice and solicit comment. The public notice period is hereby announced and will continue for forty-five (45) days from the published date of the Public Notice in the Journal & Courier. If requested, a public hearing will be held to accept comments.

This Statement of Basis summarizes information found in greater detail in the work plans, reports, or other documents in this facility's administrative record. IDEM encourages the public to review these documents in order to gain a more comprehensive understanding of the facility and the activities that have been conducted under RCRA authority. IDEM may modify this corrective action determination or select another remedy based on public comments or new information obtained.

This determination will complete the corrective action process under the RCRA Corrective Action Program for this facility. The facility must continue to comply with all applicable parts of RCRA.

II. FACILITY BACKGROUND

This facility was built from 1958 through 1961 by Rea Magnet. Prior to 1958 the land use was agricultural. Aluminum Company of America (Alcoa) purchased the Rea Magnet Wire Company, Inc. on January 18, 1958. In 1982, several Rea Magnet managers purchased Rea Magnet from Alcoa and formed a private corporation. The facility was expanded in 1965, 1967, and again in the late 1990's.

Rea Magnet manufactures enamel-coated copper, aluminum and brass magnet wire for various industries. The wire ranges from 7 gauge to 34 gauge. The wire is drawn through a series of diamond and carbide dies, reducing the diameter of the wire to customer specifications. Water-based and oil based lubricants are used in the drawing process.

Hazardous waste streams are initially managed in 14 indoor Hazardous Waste Accumulation Areas, SWMUs 1 and 7 through 19 and then are transferred to SWMU 2. Some satellite hazardous accumulation areas identified during the April 27, 1992, preliminary assessment (PA) and visual site inspection (VSI) have been relocated. These former locations have been reclassified as AOC 2 through 5. SWMU 2 did managed hazardous wastes for greater than 90 days until June 1986, then was closed as a greater than 90-day storage. Waste lubricants, water and oil based, are managed in the Waste Lubricant Tanks (SWMU 3). Scrap wire is managed in the Scrap Wire Accumulation Areas (SWMU 4). The outdoor portion of SWMU 4 has been relocated from the location identified in the 1992 PA/VSI to a new location within the facility and the location of SWMU 4 within the facility has been relocated. These former locations are identified as AOC 4 and 5. The nonhazardous scrap managed in SWMU 4 is copper, aluminum and brass wire. Volatile organic compound (VOC) vapors are burned in numerous Catalytic Incinerators (SWMU 5), located in the enameling ovens.

III. SITE ASSESSMENT

IDEM conducted a site visit on October 17, 2008, to evaluate the facility for SWMUs and AOCs that required additional scrutiny. During this visit, the following SWMUs and AOCs were evaluated:

- SWMU 1 Indoor Hazardous Waste Accumulation Area 1
- SWMU 2 Outdoor Hazardous Waste Storage Area
- SWMU 3 Waste Lubricant Tanks
- SWMU 4 Scrap Wire Accumulation Area
- SWMU 5 Catalytic Incinerators
- SWMU 6 Former Dirty Mop Underground Storage Tank (UST) Area
- SWMU 7 Indoor Hazardous Waste Accumulation Area 2
- SWMU 8 Indoor Hazardous Waste Accumulation Area 3
- SWMU 9 Indoor Hazardous Waste Accumulation Area 4
- SWMU 10 Indoor Hazardous Waste Accumulation Area 5
- SWMU 11 Indoor Hazardous Waste Accumulation Area 6
- SWMU 12 Indoor Hazardous Waste Accumulation Area 7
- SWMU 13 Indoor Hazardous Waste Accumulation Area 8
- SWMU 14 Indoor Hazardous Waste Accumulation Area 9
- SWMU 15 Indoor Hazardous Waste Accumulation Area 10



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.

Governor

Thomas W. Easterly

Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

A.1.3

July 27, 2010

Journal & Courier
Public Notice Department
217 N. Sixth Street
Lafayette, IN 47901

Dear Sir/Madam:

Re: Public Notice of Corrective Action Complete
Rea Magnet Wire Division
Tippecanoe, Lafayette, Indiana
U.S. EPA ID No. 005 478 219

Enclosed is a copy of our Public Notice regarding completion of RCRA corrective action activities at Rea Magnet Wire Division, located at 2800 Concord Road, Lafayette, Indiana 47909. Please publish this notice, one time on August 9, 2010.

Please send a notarized form and clipping showing the date of publication and the billing to Ms. Glynda Oakes, Indiana Department of Environmental Management, Office of Land Quality, (Mail Code 66-20), 100 N. Senate Avenue, Indianapolis Indiana, 46204. If a separate invoice is sent, be sure to include the publication date of the notice on the invoice.

Your timely attention to this matter is appreciated. If you have any questions, please call (800) 451-6027, press 0, and ask for Ms. Glynda Oakes at extension 3-1052 or Chris L. Myer at extension 3-4625, or call 317/233-1052 or 317/233-4625 respectively.

Sincerely,

Victor P. Windle, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

Enclosure

cc: Mr. Peter P. von Stein, P.E., Rea Magnet Wire Division
Office of Media and Communications Services, IDEM (with enclosure)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

*Mike
Sickels*

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
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(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Peter B. VonStein
Rea Magnet Wire Co.
2800 Concord Road
Lafayette, IN 47909

May 17, 2007

Re: Rea Magnet Wire Co.
EPA ID No. **IND 005 478 219**
RCRA Corrective Action Program
Notice of Inclusion on the
2020 Corrective Action Universe

Dear Mr. VonStein:

As we discussed on the phone, under a United States Environmental Protection Agency (U.S. EPA) national initiative, the Indiana Department of Environmental Management (IDEM) and U.S. EPA, Region 5 have compiled a list of facilities in Indiana deemed appropriate and important to address whether or not unacceptable environmental exposures are occurring at those active or historic hazardous waste facilities, using the Resource Conservation and Recovery Act's (RCRA) Corrective Action Program. Because the facilities on this list, which is part of a nationwide set of 3,880 RCRA facilities, have national remediation goals which will culminate in the year 2020, it is referred to as the 2020 Corrective Action Universe. Your facility is part of this 2020 Universe.

As a result, IDEM and U.S. EPA have the responsibility of ensuring that either RCRA Corrective Action has been completed, or if necessary a protective final remedy is in place (i.e. remedy construction completed) at your facility by the end of 2020. The goal is to determine whether or not environmental remediation is necessary at your facility, and if so, that an appropriate remedy is in place by 2020, even though actual attainment of cleanup goals through remedy implementation may take longer at some sites. It has been decided that your facility will be addressed by IDEM. If we have not already done so, we will be contacting you to develop a plan and a schedule that achieves this goal.

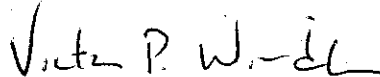
Your facility has been included in the 2020 Corrective Action Universe because one or more of the following is true:

- It is already part of the 2008 RCRA Corrective Action Baseline,
- It has a RCRA hazardous waste permit obligation, or
- IDEM and U.S. EPA agreed that potential exposures to human health or the environment at or from your facility need to be addressed under the RCRA Corrective Action Program.

Inclusion on this list does not imply failure on your part to meet any legal obligation, nor should it be construed as an adverse action against you. It only means that IDEM and U.S. EPA have identified your facility as needing to complete its RCRA Corrective Action obligations if it has not done so already. The national program goal is to largely address these cleanup obligations before the end of 2020. Accordingly, progress will be tracked for each facility in the 2020 Universe. The list of all 2020 Universe facilities will be posted on U.S. EPA headquarters' web site at <http://www.epa.gov/correctiveaction>, in the near future.

IDEM will work with you to address any remediation concerns at your facility in a manner consistent with your plans for the property. There are several options available under which you can address your corrective action obligations. If you believe that facility-wide corrective action has already been completed for your site, or if you have any questions regarding this letter, please contact Mike Sickels at (317)232-3406.

Sincerely,



Victor P. Windle, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

Cc: Mr. Hak Cho, U.S. EPA
Mr. George Hamper, U.S. EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

**77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590**

REPLY TO THE ATTENTION OF:

HRE-8J

August 31, 1992

**Mr. Peter von Stein
Rea Magnet Wire Company, Inc.
2800 Concord Road
Lafayette, Indiana 47905**

**Re: Rea Magnet Wire Company, Inc.
Lafayette, Indiana
IND 005 478 219**

Dear Mr. von Stein:

As indicated in the letter of introduction sent to you on April 20, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

**Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V**

DATE: July 27, 1992

SUBJECT: Preliminary Assessment/Visual Site Inspections

FROM: Kevin Pierard, Chief *DPH/MS for*
OH/MN Technical Enforcement Section

TO: Hak Cho, Chief
Indiana Permitting Section

Attached is the following Preliminary Assessment/Visual Site Inspection for your files:

1. Rea Magnet Wire Company

IND 005 478 219

The Executive Summary and Conclusions and Recommendations sections are "enforcement confidential", and therefore, should not be released to the public.

If you have any questions, please contact me at (312) 886-4448.

Attachment

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION

REA MAGNET WIRE COMPANY, INC.
LAFAYETTE, INDIANA
IND 005 478 219

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	IND 005 478 219
Date Prepared	:	July 22, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087-IN2W
Prepared by	:	Resource Applications, Inc. (Michael Gorman)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
EXECUTIVE SUMMARY	ES-1
1.0 INTRODUCTION	1
2.0 FACILITY DESCRIPTION	4
2.1 FACILITY LOCATION	4
2.2 FACILITY OPERATIONS	4
2.3 WASTE GENERATING PROCESSES	6
2.4 HISTORY OF DOCUMENTED RELEASES	11
2.5 REGULATORY HISTORY	11
2.6 ENVIRONMENTAL SETTING	12
2.6.1 Climate	12
2.6.2 Flood Plain and Surface Water	13
2.6.3 Geology and Soils	13
2.6.4 Ground Water	14
2.7 RECEPTORS	14
3.0 SOLID WASTE MANAGEMENT UNITS	15
4.0 AREAS OF CONCERN	21
5.0 CONCLUSIONS AND RECOMMENDATIONS	22
REFERENCES	26

Attachment

A - EPA PRELIMINARY ASSESSMENT FORM 2070-12

B - VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

C - VISUAL SITE INSPECTION FIELD NOTES

LIST OF TABLES

<u>Table</u>	<u>Page</u>
1 SOLID WASTE MANAGEMENT UNITS (SWMU)	7
2 SOLID WASTES	9
3 SWMU AND AOC SUMMARY	23

LIST OF FIGURES

<u>Figure</u>	<u>Page</u>
1 FACILITY LOCATION	5
2 FACILITY LAYOUT/SWMU AND AOC LOCATIONS	8

EXECUTIVE SUMMARY

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Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Rea Magnet Wire Company, Inc. (Rea) facility in Lafayette, Indiana. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Rea facility manufactures enamel-coated copper, aluminum, and brass wire for various industries. Wire enters the facility in wound spools and proceeds through a wire mill. Carbide and diamond dies are used to draw the wire and reduce its diameter. Water and oil are used as lubricants in the drawing process and the wastes generated are managed in Waste Lubricant Tanks (SWMU 3). After drawing, the wire proceeds to the enameling operation, where it is coated with a cresylic acid-based enamel. Hazardous wastes are generated when the enameling ovens are cleaned out and the wastes are managed in the Indoor Hazardous Waste Accumulation Areas (SWMU 1). The accumulation start dates begin when wastes are first put into the drums in SWMU 1. When full, the drums are transferred to the Outdoor Hazardous Waste Storage Area (SWMU 2) to await off-site shipment. SWMU 1 also manages a 55-gallon drum of spent Freon 113 (F002), generated from quality control (QC) work. Scrap Wire Accumulation Areas (SWMU 4) are used to manage nonhazardous scrap wire. Volatile organic compound (VOC) vapors, generated from the enameling ovens, are burned in Catalytic Incinerators (SWMU 5) located within the ovens. Rea previously had five underground storage tanks (USTs). All of the USTs managed raw virgin material. In 1980, one of the tanks was converted to a Dirty Mop Water UST (SWMU 6) and was used to manage nonhazardous dirty mop water, generated from facility maintenance.

Rea is a 3.78-acre facility located on a 58-acre parcel of land. The facility began operations in 1958 and was purchased by the Aluminum Company of America (ALCOA) in 1961. In 1986, Rea purchased the facility from ALCOA and is the current owner and operator. Rea employs 208 people, 182 of which work in operations.

Rea filed a RCRA Part A permit application on November 14, 1980, for a 15,000-gallon capacity storage area (S01), a 605-gallon capacity storage tank (S02), and an incinerator (T03). An amended Part A was resubmitted on March 19, 1982, deleting the T03 process. During the VSI, RAI confirmed that the S01 process code applied to SWMU 2; however, facility representatives did not know what unit the S02 process

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code pertained to, and assumed it was mistakenly put on the RCRA Part A application. Rea is currently regulated as a generator of hazardous waste.

The PA/VSI identified the following six SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Indoor Hazardous Waste Accumulation Areas
2. Outdoor Hazardous Waste Storage Area
3. Waste Lubricant Tanks
4. Scrap Wire Accumulation Areas
5. Catalytic Incinerators
6. Dirty Mop Water UST

Area of Concern

1. PCB Spill Area

Two separate releases to the soil have been documented at AOC 1 and near SWMU 6. In 1985, during transport, a 55-gallon drum containing polychlorinated biphenyl (PCB) contaminated oil fell off a forklift onto on-site soils located under a bridge connecting the warehouse and wire mill. Fourteen 55-gallon drums of contaminated soil were removed. No soil analysis was conducted after the soil removal to confirm if the area was adequately remediated. In June 1989, Rea removed five USTs, located in two separate areas. A group of two USTs were located on the east side of the facility and a group of three USTs were located on the west side of the facility. During the removal of the USTs from the west side of the facility, a release to the soil was detected in the cavity of a tank containing raw virgin xylene. Rea conducted a voluntary cleanup of the contaminated area. Remediation was completed by February 1992 after approximately 128 tons of contaminated soil were removed and disposed of at Adams Center Landfill, Fort Wayne, Indiana.

Potential for a release of hazardous wastes to on-site soils is low for all of the SWMUs. All hazardous wastes are managed inside 55-gallon steel drums. Of the units that manage hazardous waste, SWMUs 1, 2, and 4, only SWMU 2 is located outdoors. SWMU 1 and SWMU 4 are located indoors and are underlain by 6 inches of concrete. SWMU 2 is underlain by 6 inches of concrete, and a 12-inch-high concrete berm separates the unit from on-site soils. SWMU 3 is located indoors, is constructed of steel, and is underlain by 6 inches of concrete. The Scrap Wire Accumulation Areas (SWMU 4) manage nonhazardous scrap wire inside 4-cubic-yard dumpsters and plastic-lined cardboard boxes, which are both underlain by 6 inches of concrete. The Catalytic Incinerators (SWMU 5) burn VOC vapors at a 90 to 95 percent efficiency.

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SWMU 6 was used to manage nonhazardous dirty mop water inside a steel UST. Therefore, potential for release to environmental media is low for all SWMUs.

Rea is located at 2800 Concord Road, Lafayette, Indiana. The facility covers 3.78 acres on a 58-acre lot in a mixed rural, industrial, and residential area. The facility is bordered on the south and west by residential areas, on the north by light industry, and on the east by agricultural land. The closest school, Tecumseh Junior High School, is located approximately 0.75 mile northwest of the facility. The closest residence is 700 feet to the south. The Rea facility has an 8-foot-high chain-link fence, security guards, and video cameras.

The City of Lafayette and the facility receive water from ground water sources. Ground water can be reached at a depth of 10 to 15 feet; but most wells are located at 100 feet. The facility has two private wells used for industrial and drinking purposes, located on site, at a depth of 100 feet. The city has a well field, approximately 3 miles northwest and upgradient of the facility. The closest surface water body is Elliot Ditch, approximately 0.5 mile south of the facility.

There are no wetlands or sensitive environments within 2 miles of the facility.

Even though 14 55-gallon drums of PCB-contaminated soil were removed from AOC 1, RAI recommends conducting additional soil analyses to ensure that all contamination has been removed. RAI also recommends repairing the cracks in the concrete at SWMU 2 and backfilling the excavated hole at SWMU 6. RAI also recommends taking air samples in the area of the enameling ovens, to characterize strong solvent odors detected during the VSI. If necessary, the appropriate agency should be contacted to further evaluate the odor. RAI recommends no further action for any of the other SWMUs.

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Rea Magnet Wire Company, Inc. (Rea) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Rea facility in Lafayette, Indiana. The PA was completed on April 24, 1992. RAI gathered and reviewed information from the Indiana Department of Environmental Management (IDEM) and from EPA Region 5 RCRA files. RAI also reviewed information that is relevant to the area of the facility from the U.S. Department of Agriculture (USDA), U.S. Department of Commerce, (USDC), U.S. Geological Survey (USGS), Federal Emergency Management Agency (FEMA), Indiana Department of Natural Resources (IDNR), and the Indiana Geological Survey (IGS). The VSI was conducted on April 27, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. Six SWMUs and one AOC were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and nine inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

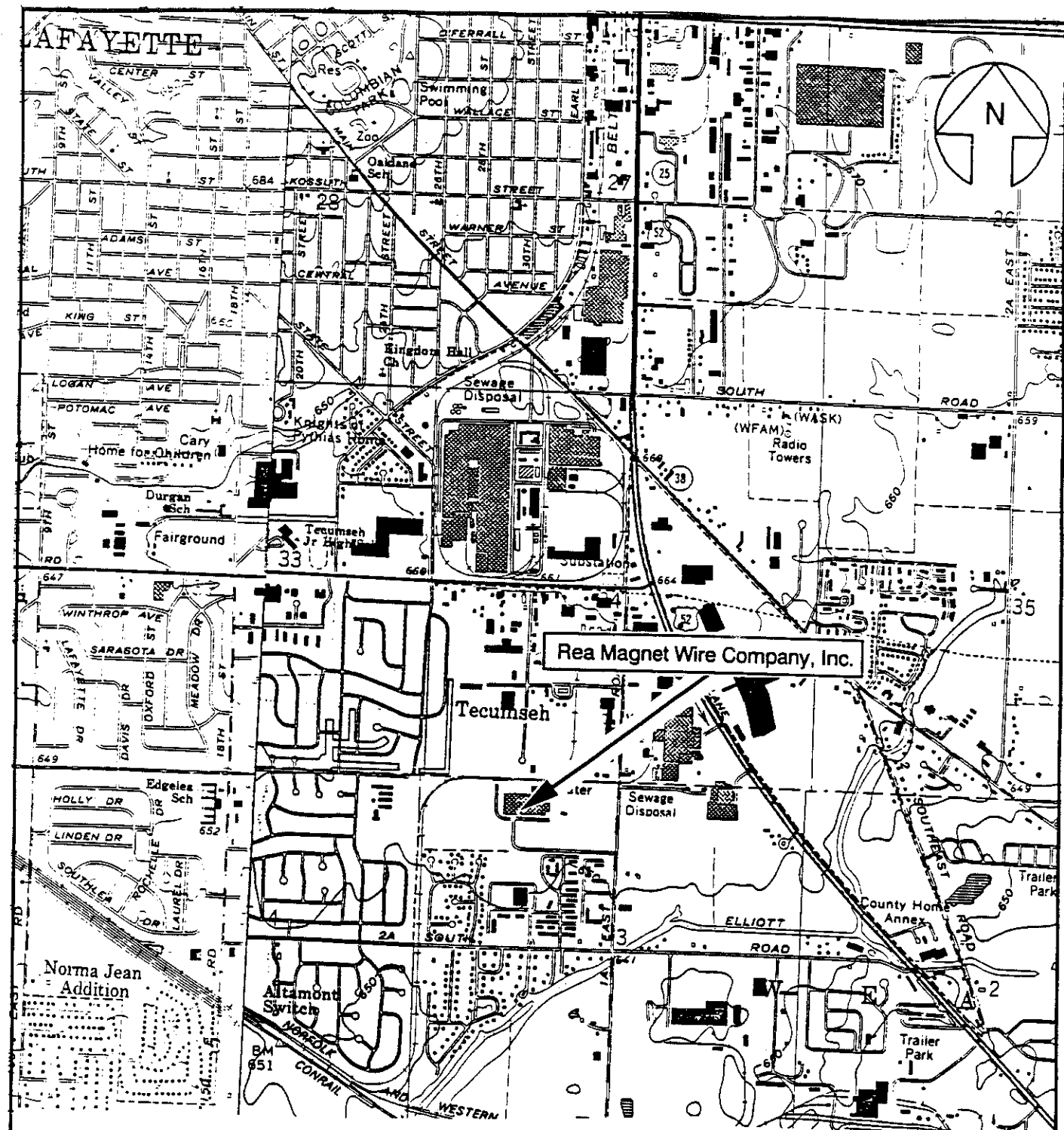
Rea is located at 2800 Concord Road in a mixed rural, industrial, and residential area of Lafayette, Tippecanoe County, Indiana (latitude 40°23'14" N and longitude 86°51'42" W), as shown in Figure 1. The 3.78-acre facility is located on a 58-acre parcel of land bounded on the north by light industry, on the south and west by residential areas, and on the east by agricultural land.


2.2 FACILITY OPERATIONS

Rea began operations in 1958 and in 1961, the facility was purchased by the Aluminum Company of America (ALCOA), Pittsburgh, Pennsylvania. In 1986, Rea purchased the company from ALCOA. Before operations began, the site was undeveloped agricultural land. Rea employs 208 people, 182 of which work in operations on three shifts, 24 hours per day, 7 days per week.

Rea manufactures enamel-coated copper, aluminum, and brass magnet wire for various industries. Copper wire constitutes 75 percent of the volume while aluminum makes up approximately 25 percent, and brass less than one percent. Rea generates about 80,000,000 pounds of coated wire per year. The wire ranges from 7 gauge to 34 gauge. Wire is drawn through a series of diamond and carbide dies, reducing the diameter of the wire to customer specifications. Both water-based and oil-based lubricants are used in the drawing process. After drawing, the wire is heat-treated in an 800° to 1,000°F oven, quenched with water, coated with enamel, coated with a solvent, wax, and oil-based lubricant, wound onto spools, and packed for shipping.

Hazardous wastes are initially managed in four Indoor Hazardous Waste Accumulation Areas (SWMU 1) before transfer to an Outdoor Hazardous Waste Storage Area (SWMU 2). Accumulation start dates begin when wastes are put into drums at SWMU 1. SWMU 2 previously managed hazardous wastes for greater than 90 days until June 1986, at which point the unit was closed as a greater than 90-day storage area. Waste water-based and oil-based lubricants used in the drawing operation are managed in separate Waste Lubricant Tanks (SWMU 3). Scrap Wire Accumulation Areas (SWMU 4) are used to manage



Rea Magnet Wire Company, Inc. Lafayette, Indiana
Figure 1 FACILITY LOCATION
Scale: 1:24,000 Source: Modified from USGS, 1980 and 1986
 Resource Applications, Inc.

nonhazardous scrap copper, aluminum, and brass wire. Volatile organic compound (VOC) vapors are burned in numerous Catalytic Incinerators (SWMU 5), located in the enameling ovens.

Rea previously had five underground storage tanks (USTs), located in two separate areas of the facility. Two USTs, located on the east side of the facility, contained cresylic acid and xylene, while three tanks located on the west side of the facility contained LS100 (an aromatic solvent), xylene, and dirty mop water. All of the USTs had volumes of 5,000 gallons, and all contained raw material except the Dirty Mop Water UST (SWMU 6), which contained dirty mop water generated from maintenance. All of the tanks were removed in June 1989 and slight soil contamination was detected around the west xylene UST. Rea began a voluntary cleanup of the area in 1991, and completed the remediation in February 1992. The remaining USTs were clean closed. A list of facility SWMUs is included as Table 1. The facility layout, including the locations of the six SWMUs and one AOC, is included as Figure 2.

2.3 WASTE GENERATING PROCESSES

The primary waste streams generated at the facility include enameling wastes, spent Freon 113, waste lubricants, copper sludge, and aluminum sludge. Table 2 is a complete listing of wastes generated at the Rea facility.

The majority of hazardous wastes are generated from the enameling operation. These wastes are separated into two categories, liquid and solid. The liquid enamel waste is a combination of cresylic acid-based enamel and thinner (D001, D026, F003). The solid enamel waste is made up of enameling filters, gloves, and rags (D001, D026, F004). Liquid enamel waste is generated from the cleanup of enameling ovens or from off-specification (off-spec.) enamel. The liquid is collected in a 5-gallon plastic bucket and transferred into a 55-gallon steel drum located at one of four separate Indoor Hazardous Waste Accumulation Areas (SWMU 1). Solid enamel waste is generated when enameling filters are changed or when rags and gloves come in contact with the enamel coating. The solid wastes are collected in 55-gallon drums, also located at SWMU 1. When full, the drums are transferred to the Outdoor Hazardous Waste Storage Area (SWMU 2). The accumulation start date begins when wastes are placed in the drums at SWMU 1. Enameling wastes are generated at a rate of 72,000 pounds per year and are removed by Petro-Chem in Detroit, Michigan.

Freon 113 is used to remove lubricants from coated wire during quality control (QC) laboratory work. The spent Freon 113 (F002) is poured into a 55-gallon steel drum and managed at the Indoor

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit*</u>	<u>Status</u>
1	Indoor Hazardous Waste Accumulation Areas	No	Active, less than 90 day storage.
2	Outdoor Hazardous Waste Storage Area	Yes	RCRA closed in 1986. Currently active for less than 90-day storage of hazardous waste.
3	Waste Lubricant Tanks	No	Active, manages nonhazardous waste.
4	Scrap Wire Accumulation Areas	No	Active manages hazardous and nonhazardous waste.
5	Catalytic Incinerators	No	Active.
6	Dirty Mop Water UST	No	Inactive, removed in June 1989.

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

- Solid Waste Management Units (SWMU)**
1. Indoor Hazardous Waste Storage Areas
 2. Outdoor Hazardous Waste Storage Area
 3. Waste Lubricant Tanks
 4. Satellite Accumulation Areas
 5. Catalytic Incinerators located inside several ovens throughout the enameling operation.
 6. Dirty Mop Water UST
- Area of Concern**
1. PCB Spill Area

Rea Magnet Wire Company, Inc.
Lafayette, Indiana

Figure 2
FACILITY LAYOUT/SWMU AND AOC LOCATIONS

Scale: 1" = 50'

Source: Modified from REA, 1992

Resource Applications, Inc.

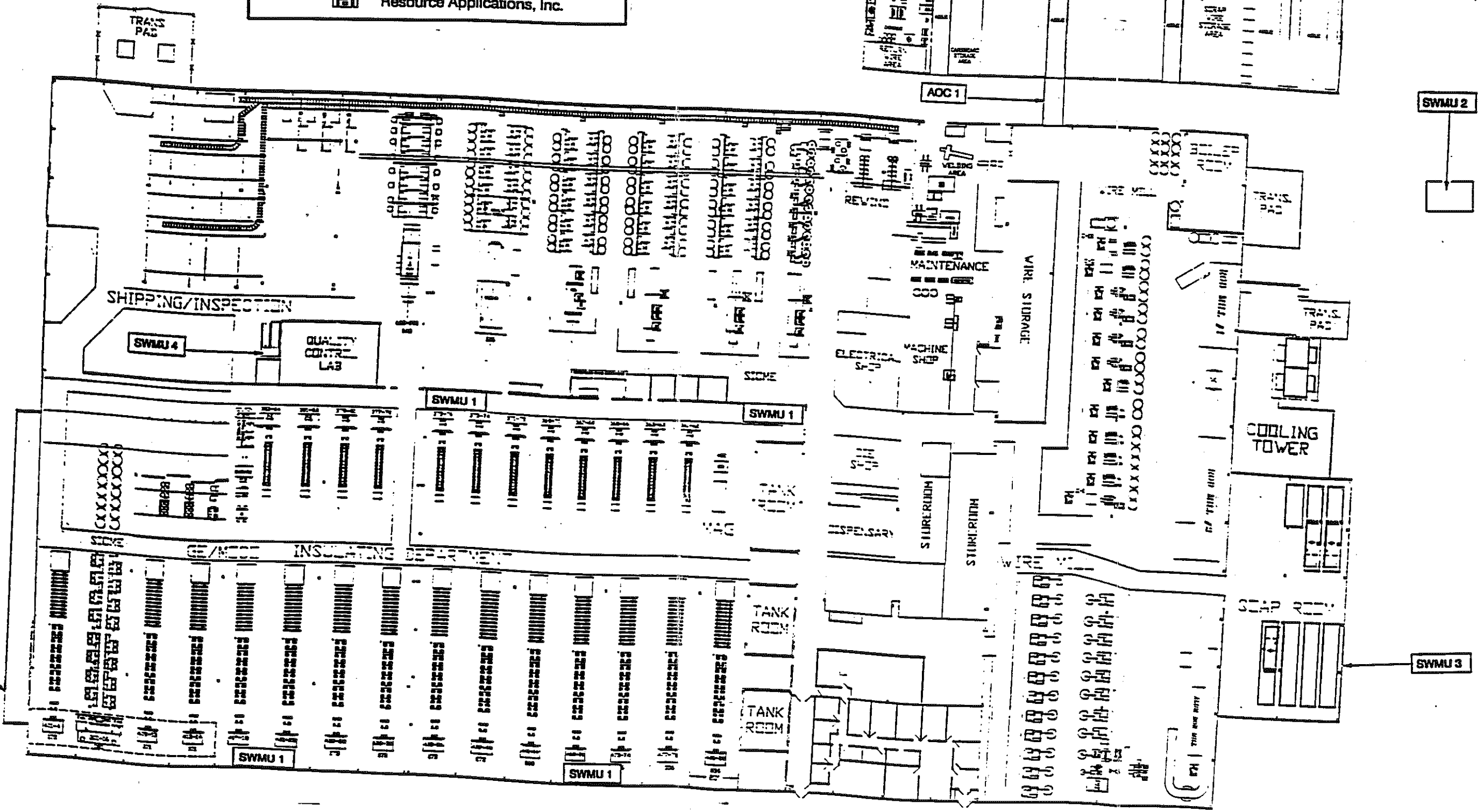
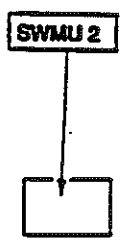
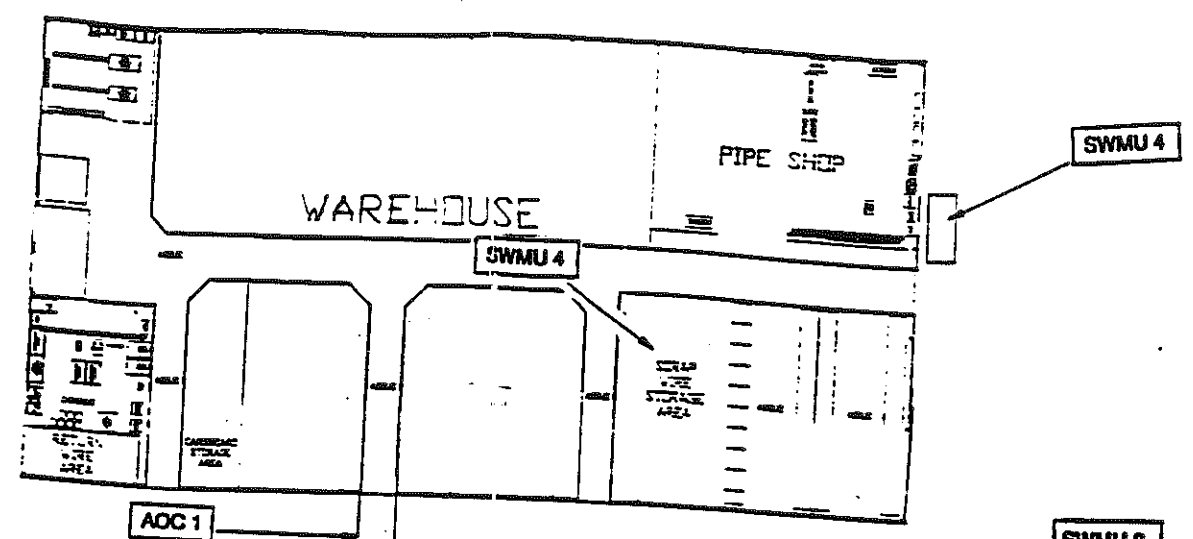
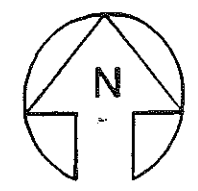


TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit*</u>
Liquid Enamel Waste/ D001, D026, F003	Enameling Operation	1 and 2
Solid Enamel Waste/ D001, D026, F004	Enameling Operation	1 and 2
Spent Freon 113/F002	Quality Control	1
Spent TCA/F001	Maintenance	2
Spent MEK/F005	Maintenance	2 and 3
Filter Paper/NA**	Drawing Operation	2
Waste Lubricant Oil/NA**	Drawing Operation	3
Waste Lubricant Water/NA**	Drawing Operation	3
Dirty Mop Water/NA**	Maintenance	3 and 6
Scrap Copper/NA**	Production	4
Scrap Aluminum/NA**	Production	4
Scrap Brass/NA**	Production	4
Copper Sludge/NA**	Maintenance	2
Aluminum Sludge/NA**	Maintenance	2
VOC Vapors/NA**	Enameling Operation	5

Notes:

* Primary management unit refers to a SWMU that currently manages or formerly managed the waste.

** Nonapplicable (NA) designates nonhazardous waste.

Hazardous Waste Accumulation Areas (SWMU 1). When the drum is full, about once every two years, the waste is sent to the Rea facility in Fort Wayne, Indiana.

The facility previously used 1,1,1-trichloroethane (TCA) from the early 1980s to 1986, to clean wires. Wires were soaked in a basket inside a 55-gallon steel drum of TCA. When the TCA became unusable, the whole drum was transported to SWMU 2. Generated at a rate of 55 gallons per year, the spent TCA was removed by Heritage Environmental, Inc. (Heritage) of Indianapolis, Indiana.

Methyl ethyl ketone (MEK) was previously used for maintenance parts cleaning. The waste was blended with and included with the waste lubricant oils generation rate. Facility representatives stated that the amount of spent MEK was minimal and that this particular method of waste management ceased in 1991. The facility now uses a nonhazardous cleaner that is discharged to the City of Lafayette sanitary sewer system.

Copper, aluminum, and brass wires are drawn through various dies to reduce the diameter of the wire to customer specifications. Oil-based and water-based coolants are used as lubricants in the drawing process. Both the oil and water lubricating processes are closed-loop systems. Wastes are generated when the process reservoirs are cleaned out. When the waste lubricant oil and waste lubricant water are cleaned out of the system, the wastes are pumped to Waste Lubricant Tanks (SWMU 3). The Waste Lubricant Tanks consist of one tank for oil and two tanks for water. The tanks used to collect waste lubricant water are also used to collect dirty mop water from facility maintenance. Heritage removes the combined lubricant water and dirty mop water at a rate of 146,000 gallons per year. Waste lubricant oil is generated at a rate of 7,400 gallons per year and is picked up by Safety-Kleen Corp. in Chicago, Illinois. When the oil-lubricant system is cleaned out, aluminum sludge is generated from the bottom of the oil reservoir. The sludge is scraped into 55-gallon drums and transferred to SWMU 2 at a rate of 14 drums per year. Copper sludge is generated in the same fashion from the water-lubricant reservoir; but at a rate of 20 drums per year. Filter paper is used in the lubricating process to remove copper, aluminum, and brass particles. Dirty filter paper is removed, placed in 55-gallon drums, and transferred to SWMU 2 at a rate of 56 drums per year. The aluminum sludge, copper sludge, and filter paper are all removed by Heritage.

In 1991, the facility removed enameling ovens containing asbestos insulation. The waste was sent to Adams Center Landfill in Fort Wayne, Indiana for disposal.

When the enamel coating is applied to the wire, VOC vapors are generated. The vapors are vacuumed to Catalytic Incinerators (SWMU 5), located within the enameling ovens, and incinerated.

As of February 1988, all polychlorinated biphenyl (PCB) capacitors and transformers have been removed from the facility. The wastes were initially sent to Rea's Fort Wayne, Indiana facility, where they were transferred to the Chemical Waste Management Incinerator, Chicago, Illinois for incineration.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils, at the Rea facility.

In September 1985, during transport, a 55-gallon drum containing PCB-contaminated oil fell off a forklift onto on-site soils. The incident occurred under a bridge connecting the warehouse and wire mill. The facility removed 14 55-gallon drums of contaminated soil from the PCB Spill Area (AOC 1) and transferred the waste to Chemical Waste Management's Emelle Hazardous Waste Landfill in Emelle, Alabama. No post-removal soil samples were taken to confirm if all of the contaminated soil had been removed.

When the facility removed five USTs in 1989, xylene-contaminated soil was detected in the cavity of an UST containing xylene on the west side of the facility. Facility representatives did not know when the release occurred, but stated it probably happened when the tank was filled with raw virgin product. Heritage Remediation/Engineering, Inc. (HR/E) conducted a site assessment in March 1990. HR/E, on behalf of Rea, began a voluntary cleanup in October 1991, and by February 1992 the area was remediated (HR/E, 1992). Approximately 128 tons of contaminated soil were removed and disposed of at Adams Center Landfill. Post-removal soil analysis determined that all the contaminated soil had been removed.

2.5 REGULATORY HISTORY

Rea filed a Notification of Hazardous Waste Activity on November 10, 1980, identifying the company as a generator and treatment, storage, or disposal (TSD) facility (Rea, 1980a). A Part A permit application was filed on November 14, 1980 listing a 15,000-gallon capacity container storage area (S01), a 605-gallon storage tank (S02), and an incinerator (T03), capable of burning 25,500 pounds of hazardous waste per year (Rea, 1980b). On March 13, 1982, the facility resubmitted a Notification of Hazardous Waste Activity, again, identifying Rea as a generator and TSD (Rea, 1982a). A second Part A was resubmitted on March 19, 1982 removing the T03 process code (Rea, 1982b). The S01 process code pertained to SWMU 2; however, facility representatives did not know what the S02 process code pertained to, and believed it was mistakenly put on the Part A application.

According to documents made available at IDEM, two separate RCRA inspections have been conducted at the facility. A December 4, 1981 RCRA inspection by IDEM revealed numerous paperwork violations (IDEM, 1981). A November 7, 1985 RCRA inspection by IDEM detected paperwork violations and also discovered that the facility had stored wastes for greater than 90 days (IDEM, 1985a). A Notice of Violation (NOV) was issued on December 4, 1985 (IDEM, 1985b). A Notice of Compliance (NOC) was issued on October 10, 1986, stating that the violations were resolved (IDEM, 1986a).

Rea submitted a Container/Storage Closure Request (EPA Policy #121) on September 25, 1985 for the closure of SWMU 2. The closure was approved during a June 27, 1986 Policy #121 Closure Inspection conducted by IDEM. A November 3, 1986 letter from IDEM to EPA requested the withdrawal of Rea's Part A permit application (IDEM, 1986b). Currently, Rea is regulated as a generator of hazardous waste.

Rea currently holds eight air permits with IDEM to control air emissions generated from 32 enameling ovens. The facility renewed the permits and are awaiting a response from IDEM. The facility has no history of odor complaints from neighboring residences or facilities.

Rea does not have, nor is it required to have a National Pollutant Discharge Elimination System (NPDES) permit. Rea has a Wastewater Discharge Permit from the City of Lafayette to discharge quench water to the sanitary sewer system. The water originates from a closed-loop quenching system used to cool uncoated copper wire. The process water is discharged from the quenching operation directly to the sewer system.

There have been no reported violations for the above mentioned permits.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Rea facility.

2.6.1 Climate

The climate in Tippecanoe County is typically continental, with warm summers, cool winters, and frequent short-period fluctuations in temperature, cloudiness, and wind direction. The average daily temperature is 51.7°F. The lowest average daily temperature is 28.9°F in January. The highest average daily temperature is 75°F in July (Ruffner, 1985).

The total annual precipitation for the county is 37.21 inches (Ruffner, 1985). The mean annual lake evaporation for the area is about 32 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall is 5.10 inches (USDC, 1968).

The prevailing wind is from the southwest. Average wind speed is highest in March at 11.7 miles per hour from the west northwest (USDC, 1968). The average wind speed is 9.6 miles per hour from a southwesterly direction (USDC, 1968).

2.6.2 Flood Plain and Surface Water

The Rea facility is not located in a 500-year flood plain (Warzyn, 1991). The nearest surface water body, Elliot Ditch, is located 0.5 mile south of the facility and is used for storm water drainage. This surface water body discharges to Wea Creek, which in turn discharges to the Wabash River.

Surface water drainage at the facility is directed via open ditches into the ALCOA sewer, which flows 0.5 mile south to Elliot Ditch, then into Wea Creek and eventually the Wabash River located 3 miles west of the facility.

The topography of the site and local area is very flat, and drainage is probably minimal. A NPDES permit is neither held nor required for stormwater discharges.

2.6.3 Geology and Soils

The uppermost bedrock underlying the facility is the New Albany Shale of Devonian age. This is a black and greenish-gray shale underlain by limestones and dolomites of the Muscatatuck Group, and Silurian limestones and dolomites of the Wabash Formation (IGS, 1987).

Soils to a depth of 2 feet beneath the facility consist of a black or dark brown moist clay loam. The soil becomes more sandy and silty with depth, and beneath 6 feet, approximately 5 percent of the soil unit consists of coarse pebbly gravel material. Sand and gravel lenses occur throughout the deeper part of the unconsolidated deposits or drift. The drift consists of ground moraine deposits, that is glacial material deposited directly by ice sheets and is of Pleistocene age. The depth to bedrock is approximately 175 feet (IGS, 1952).

2.6.4

Ground Water

The shallow water table at the site is about 10 to 15 feet below grade, and water is isolated in sand and gravel lenses surrounded by confining sandy silty clay (Warzyn, 1991). Less than 0.25 mile to the southeast is the boundary between the ground moraine deposits that underlie the facility and the outwash plain sand and gravel deposits. The latter form a widely-used aquifer due to high permeability and ground water flow rates. However, according to a report by HR/E, the facility area is not thought to be hydraulically in contact with the outwash deposit aquifer (HR/E, 1990). An unconfined aquifer occurs approximately 80 feet below grade (Warzyn, 1991).

2.7

RECEPTORS

The Rea facility occupies 3.78 acres in a mixed rural, industrial, and residential area of Lafayette, Tippecanoe County, Indiana. Lafayette has a population of about 43,000 people. Rea employs 208 people, 182 working in three shifts, 24 hours per day, 7 days per week.

The Rea facility is bordered on the north by light industry, on the south and west by residential areas, and on the east by agricultural land. The nearest school, Tecumseh Junior High School, is located about 0.75 mile northwest of the facility. The closest residence is located 700 feet to the south. Facility access is controlled by an 8-foot-high chain-link fence, video cameras, and security guards.

The nearest surface water body, Elliot Ditch, is located 0.5 mile south of the facility and is used for storm water drainage.

Ground water supplies water to both the facility and the City of Lafayette. Ground water can be attained at a depth of 10 to 15 feet; however, according to Roman Hahn, Lafayette Water Department, municipal wells are drilled to a depth of 100 feet. Two private wells are located on site, 200 feet south of the main building at a depth of 100 feet. One well supplies the facility with drinking water and the other well supplies the facility with industrial water. The closest municipal wells are located in a well field 3 miles northwest and upgradient of the facility. There are no sensitive environments or wetlands located within 2 miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the six SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI observations.

SWMU 1

Indoor Hazardous Waste Accumulation Areas

Unit Description:

The Indoor Hazardous Waste Accumulation Areas are located around the perimeter of the enameling department and adjacent to a QC laboratory. The four areas in the enameling department each measure 3 feet by 10 feet. One area contained 2 drums, two areas contained 3 drums, and the fourth area contained 4 drums. The wastes are generated from the cleanup of enameling ovens. When the drums become full, they are transferred to the Outdoor Hazardous Waste Storage Area (SWMU 2). The QC accumulation area consists of one 55-gallon steel drum in a 3-foot by 3-foot area. The waste is generated from laboratory QC work. When full, the drum is transferred to the Rea facility in Fort Wayne, Indiana (see Photographs No. 1 and 2).

Date of Startup:

This unit began managing enameling wastes in the mid-1970s and QC wastes in 1980.

Date of Closure:

This unit is currently active and manages hazardous waste for less than 90 days.

Wastes Managed:

The unit manages liquid enamel waste (D001, D026, F003) and solid enamel waste (D001, D026, F004) in the enameling areas and spent Freon 113 (F002) in the QC area.

Release Controls:

The wastes are managed indoors, inside 55-gallon steel drums, on a sheet of cardboard, underlain by 6 inches of concrete. The unit does not have secondary containment.

**History of Documented
Releases:**

No releases from this unit have been documented.

Observations:

At the time of the VSI, a total of 13 drums were observed at the unit and all appeared in sound condition. Some stains were noted on the cardboard underneath the drums. No floor drains were noted.

SWMU 2

Outdoor Hazardous Waste Storage Area

Unit Description:

The Outdoor Hazardous Waste Storage Area is located in the northeast corner of the facility. The unit measures approximately 40 feet by 40 feet, is underlain by 6 inches of concrete, and has a 1-foot-high concrete berm separating the unit from on-site soils (see Photograph No. 3).

Date of Startup:

This unit began managing wastes in the mid-1970s.

Date of Closure:

This unit underwent EPA Policy #121 closure on June 27, 1986. The unit currently manages waste for less than 90 days.

Wastes Managed:

This unit manages liquid enamel waste (D001, D026, F003), solid enamel waste (D001, D026, F004), spent TCA (F001), filter paper (nonhazardous), copper sludge (nonhazardous), and aluminum sludge (nonhazardous).

Release Controls:

The wastes are managed inside 55-gallon steel drums, underlain by 6 inches of concrete. A 1-foot-high concrete berm surrounds the north, east, and south sides, separating the unit from on-site soils. The berm does not surround the unit on the west side and the slope is not pitched towards the berm. The west side opens towards a large concrete transportation area connecting the unit with the building.

**History of Documented
Releases:**

No releases from this unit have been documented.

Observations:	At the time of the VSI, 30 drums of hazardous waste and several drums of nonhazardous waste were observed. All appeared in sound condition. Numerous cracks and stains were noted in the concrete pad.
<div style="display: flex; justify-content: space-between;"> <div style="width: 20%;">SWMU 3</div> <div style="width: 80%;">Waste Lubricant Tanks</div> </div>	
Unit Description:	The Waste Lubricant Tanks are located indoors in the southeast corner of the facility. The unit consists of three tanks, a 4,000-gallon steel waste lubricant oil tank, a 7,800-gallon steel waste lubricant water tank, a 5,500-gallon steel waste lubricant water tank, a 3-foot by 4-foot sump, and a filtering machine. The wire drawing lubricating process is a closed-loop system and the tanks are used to hold oil or water when the lubricating oil and water are changed. The sump is used to collect and pump dirty mop water to the 7,800-gallon tank. The filter paper is used to collect copper, aluminum, and brass particles generated from the drawing process (see Photographs No. 4, 5, and 6).
Date of Startup:	This unit began operation in 1958.
Date of Closure:	This unit is currently active.
Wastes Managed:	This unit manages the following spent nonhazardous materials: waste lubricant oil, waste lubricant water, dirty mop water. The unit also generates nonhazardous filter paper. For a short period of time, the facility mixed spent MEK (F005) with waste lubricant oil.
Release Controls:	The wastes are managed indoors, inside steel tanks underlain by 6 inches of concrete. Any release would flow towards the sump which would then pump the material back to the waste tanks.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The tanks appeared in sound condition and no evidence of release was noted.

SWMU 4**Scrap Wire Accumulation Areas****Unit Description:**

The Scrap Wire Accumulation Areas are located indoors, except for one area located outdoors, north of the main plant operations and south of the warehouse. The indoor areas consist of several 4-cubic-yard dumpsters used to accumulate scrap wire. The outdoor area is used to collect scrap brass wire, in 4-cubic-yard plastic-lined cardboard boxes. The scrap wire is divided by type and whether or not an enamel coating has been applied. There is no defined area for scrap wire storage (see Photographs No. 7 and 8).

Date of Startup:

This unit began collecting scrap wire at the start of operations in 1958.

Date of Closure:

This unit is currently active.

Wastes Managed:

This unit manages nonhazardous scrap copper, aluminum, and brass wire.

Release Controls:

All wastes are managed indoors, inside metal containers, except the brass accumulation area, which is located outdoors, inside plastic-lined cardboard boxes. The unit does not have secondary containment.

History of Documented Releases:

No releases from this unit have been documented.

Observations:

Scrap wire was observed in several containers located throughout the facility during the VSI. The wire containers appeared in good condition and no evidence of release was noted.

SWMU 5**Catalytic Incinerators****Unit Description:**

The Catalytic Incinerators are located indoors, inside the 32 enameling ovens, and are used to incinerate VOC vapors. The vapors are vacuumed to the incinerator where they are burned at 1,000°F, at a 90 to 95 percent efficiency. Because the incinerators are located inside the oven, no photograph was taken.

Date of Startup: This unit began operation in 1982.

Date of Closure: This unit is currently active.

Wastes Managed: This unit incinerates VOC vapors generated from the enameling ovens.

Release Controls: The unit is located indoors, and controls VOCs at a 90 to 95 percent efficiency. The unit does not have a scrubber or secondary containment.

History of Documented Releases: No releases from this unit have been documented.

Observations: The incinerators are located inside the oven and could not be observed or photographed. There was a strong solvent odor emanating from the enameling oven.

SWMU 6

Dirty Mop Water UST

Unit Description: The unit was located on the west side of the facility. The 5,000-gallon steel tank was used to manage dirty mop water. The waste was pumped from a sump located in SWMU 3, to this unit (see Photograph No. 9).

Date of Startup: This unit began managing wastewater in 1980.

Date of Closure: This unit was removed in June 1989.

Wastes Managed: This unit managed nonhazardous dirty mop water.

Release Controls: The steel tank was located underground and did not have secondary containment.

History of Documented Releases: No releases from this unit have been documented.

Observations: When the UST was removed in 1989, a xylene UST and an aromatic solvent UST were also removed. Xylene-contaminated soil was detected

around the xylene UST and a voluntary cleanup began in 1991.

Remediation was completed by February 1992 but the hole has not been filled in and water has pooled.

4.0 AREAS OF CONCERN

RAI identified one AOC during the PA/VSI. This AOC is discussed below; its location is shown in Figure 2.

AOC 1

PCB Spill Area

In September 1985, during transport, a drum of PCB oil spilled and was released to on-site soils. The release occurred outdoors, next to a bridge connecting the warehouse with the wire mill. Fourteen 55-gallon steel drums of contaminated soil were removed. This area is an AOC because no post-removal analysis was conducted to determine if all contaminated soil was removed.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified six SWMUs and one AOC at the Rea facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3 summarizes the six SWMUs and one AOC at the Rea facility and recommended further actions.

SWMU 1

Indoor Hazardous Waste Accumulation Areas

Conclusions:

The unit consists of four areas used to manage liquid enameling wastes (D001, D026, F003) and solid enameling wastes (D001, D026, F004) generated from the wire enameling operation and one area used to manage spent Freon 113 (F002) generated from laboratory QC work. All of the areas are located indoors and wastes are managed inside closed 55-gallon steel drums, underlain by 6 inches of concrete. Therefore, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations:

RAI recommends no further action for this unit.

SWMU 2

Outdoor Hazardous Waste Storage Area

Conclusions:

The unit, located outdoors, northeast of the plant operations, is used to manage hazardous and nonhazardous wastes for less than 90 days. Wastes are managed inside closed 55-gallon steel drums on top of wooden pallets, underlain by 6 inches of concrete, and surrounded on three sides by a 12-inch-high concrete berm. There are cracks in the concrete flooring; however, because the wastes are securely managed inside drums, potential for release to ground water, surface water, air, or on-site soils is low.

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TABLE 3
SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Indoor Hazardous Waste Accumulation Areas	Mid 1970s to present	None	RAI recommends no further action for this unit.
2. Outdoor Hazardous Waste Storage Area	Mid 1970s to present	None	RAI recommends repairing the cracks in the concrete base.
3. Waste Lubricant Tanks	1958 to present	None	RAI recommends no further action for this unit.
4. Scrap Wire Accumulation Areas	1958 to present	None	RAI recommends no further action for this unit.
5. Catalytic Incinerators	1982 to present	None	RAI recommends taking air samples to characterize solvent odor detected inside the facility. If necessary, contact the appropriate agency for further evaluation.
6. Dirty Mop Water UST	1980 to 1989	None	RAI recommends backfilling the hole.
<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. PCB Spill Area	1985 to present	In 1985, a release of 55 gallons of PCB oil occurred.	Conduct soil analysis to determine if all contamination has been removed.

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Recommendations:

Even though wastes are managed inside 55-gallon steel drums and potential for release is low, RAI recommends repairing the cracks in the concrete base to further reduce release potential.

SWMU 3**Waste Lubricant Tanks****Conclusions:**

The unit is located indoors, in the southeast corner of the facility, and is used to manage nonhazardous waste lubricant oil, waste lubricant water, and dirty mop water. Both the oil-based and water-based wastes are managed indoors inside steel tanks, and underlain by 6 inches of concrete. Therefore, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations:

RAI recommends no further action for this unit.

SWMU 4**Scrap Wire Accumulation Areas****Conclusions:**

The unit is used to accumulate nonhazardous scrap wire indoors and outdoors. The scrap wire is managed inside 4-cubic-yard steel dumpsters and plastic-lined cardboard boxes, underlain by 6 inches of concrete. Therefore, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations:

RAI recommends no further action for this unit.

SWMU 5**Catalytic Incinerators****Conclusions:**

The 32 Catalytic Incinerators are used to burn VOC vapors generated from enameling ovens. VOC vapors are vacuumed to the incinerators, located within the ovens, where they are burned at 1,000°F. Because the wastes are in a gaseous state, potential for release to ground water, surface water, or on-site soils is low. Also, the wastes are incinerated at a 90 to 95 percent efficiency; therefore potential for release to air, is also low.

Recommendations:

Because of the strong solvent odors emanating from the enameling ovens, RAI recommends taking air samples to characterize the odor. If necessary, the appropriate agency should be contacted to further evaluate the odor.

SWMU 6**Dirty Mop Water UST****Conclusions:**

This unit was temporarily used to manage dirty mop water generated from facility maintenance. The unit, along with four additional USTs, was removed in June 1989. No release from this unit was detected upon removal. Because the unit managed nonhazardous waste and has since been removed, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations:

RAI recommends backfilling the hole.

AOC 1**PCB Spill Area****Conclusions:**

In 1985, a release to on-site soils of 55 gallons of PCB contaminated oil occurred. According to facility representatives, the release was immediately cleaned up and 14 55-gallon drums of contaminated soil were removed. Municipal ground water wells and two on-site wells are located at a depth of 100 feet; thus release potential to this medium is low. Because the release was confined to on-site soils, release potential to surface water and air is low.

Recommendations:

Despite the fact that fourteen 55-gallon drums of contaminated soils were removed, no post-removal soil analysis was conducted. It is not known if all of the contaminated soil was removed. Therefore, soil analysis should be conducted to confirm remediation of the area.

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- IDEM, 1986a. Notice of Compliance for November 7, 1985 inspection, October 10.
- IDEM, 1986b. Correspondence from IDEM to EPA requesting the reclassification of Rea to generator only, November 3.
- Indiana Geological Survey (IGS), 1952. Geological Map of Tippecanoe County, Indiana. Miscellaneous Map No. 2.
- IGS, 1987. Bedrock Geologic Map of Indiana. Miscellaneous Map No. 48.
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- Ruffner, J.A., 1985. Climates of the States, Vol. 1, Gale Research Co., Detroit, Michigan.
- United States Department of Commerce (USDC), 1968. Climatic Atlas of the United States. U.S. Government Printing Office, Washington D.C.
- United States Geological Survey (USGS), 1981 and 1987. 7.5-minute Topographical Series: Modified Lafayette West and Lafayette East Quadrangles, Indiana.
- Warzyn, 1991. Phase I Environmental Assessment, November.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IN 02 SITE NUMBER IND 005 478 219

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Rea Magnet Wire Company, Inc.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 2800 Concord Road			
03 CITY Lafayette	04 STATE IN	05 ZIP CODE 47905	06 COUNTY	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 40 23 14.N		LONGITUDE 086 51 42.W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Interstate 65 to Highway 38 west, to Sagamore Parkway south, to Teal Road west, to Concord south to facility, on west side of the road.					

III. RESPONSIBLE PARTIES

01 OWNER (If known) Rea Magnet Wire Company, Inc.		02 STREET (Business, mailing, residential) 3600 East Pontiac Street			
03 CITY Fort Wayne	04 STATE IN	05 ZIP CODE 46896	06 TELEPHONE NUMBER (219) 424-4252		
07 OPERATOR (If known and different from owner) Rea Magnet Wire Company, Inc.		08 STREET (Business, mailing, residential) 2800 Concord Road			
09 CITY Lafayette	10 STATE IN	11 ZIP CODE 47905	12 TELEPHONE NUMBER (317) 474-3455		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 11 / 10 / 80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____ / ____ / ____ <input type="checkbox"/> C. NONE MONTH DAY YEAR MONTH DAY YEAR					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 04 / 27 / 92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): Resource Applications, Inc.			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1958 Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Cresylic acid, xylene, phenols, enamel thinner, Freon, lubricant oil, copper wire, and aluminum wire.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION In 1985, 55 gallons of PCB oil were released to on-site soils. It is not known if all of the contaminated soil has been removed.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input checked="" type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard		02 OF (Agency/Organization) EPA Region V		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Michael Gorman		05 AGENCY	06 ORGANIZATION Resource Applications, Inc.	07 TELEPHONE NUMBER (312) 332-2230	08 DATE 04 / 27 / 92 MONTH DAY YEAR

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Rea Magnet Wire Company, Inc.
Lafayette, Indiana
IND 005 478 219

Date: April 27, 1992

Facility Representatives: Peter von Stein, Technical Manager
Rick Robertson, Engineering Specialist

Inspection Team: Michael Gorman, Resource Applications, Inc. (RAI)
Tony Dominic, RAI

Photographer: Tony Dominic, RAI

Weather Conditions: Cold, windy, temperature about 40°F

Summary of Activities: The visual site inspection (VSI) began at 10:00 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed Rea's past and current operations, solid wastes generated, and history of documented releases. Most of the information was exchanged on a question-and-answer basis. Mr. von Stein provided the inspection team with copies of documents requested.

The VSI tour began at 1:30 p.m. and included a walk-through inspection in which RAI observed Rea's operations and solid waste management units. The tour concluded at 3:30 p.m. after which the inspection team held an exit meeting with Mr. von Stein and Mr. Robertson. The VSI was completed and the inspection team left the facility at 4:00 p.m.



Photograph No. 1

Orientation: North

Description: This is one of the four Indoor Hazardous Waste Accumulation Areas.

Location: SWMU 1

Date: 4/27/92



Photograph No. 2

Orientation: Southeast

Description: Indoor Hazardous Waste Accumulation Area for spent Freon 113 (F002).

Location: SWMU 1

Date: 4/27/92



Photograph No. 3

Orientation: East

Description: The Outdoor Hazardous Waste Storage Area. Note the cracks in the pad.

Location: SWMU 2

Date: 4/27/92



Photograph No. 4
Orientation: West
Description: The sump area in the Waste Lubricant Tanks.

Location: SWMU 3
Date: 4/27/92



Photograph No. 5
Orientation: South
Description: The Waste Lubricant Tanks.

Location: SWMU 3
Date: 4/27/92



Photograph No. 6
Orientation: South
Description: Filter paper used to collect nonhazardous copper and aluminum particles.

Location: SWMU 3
Date: 4/27/92



Photograph No. 7
 Orientation: South
 Description: Scrap Wire Accumulation Area for brass.

Location: SWMU 4
 Date: 4/27/92



Photograph No. 8
 Orientation: West
 Description: Scrap Wire Accumulation Area for copper and aluminum.

Location: SWMU 4
 Date: 4/27/92



Photograph No. 9

Orientation: South

Description: Excavated area where the Dirty Mop Water UST, xylene UST, and aromatic solvent UST were located.

Location: SWMU 6

Date: 4/27/92

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

Rea Magnet & Wire, Lafayette, IN
40° F

Pete von Stein

10:00 am

Rick Robertson

Surrounding Property

S - Residential / Apartments / Homes

W - " " / School

N - Light Industrial

E - Agricultural

School is N.W. of Facility

Closest Residence 700.-800 to the south

Two wells on site use for industrial &
drinking

both at 100'

Mfg. magnet wire

Cu wire 75% of vol.

Al wire 25%

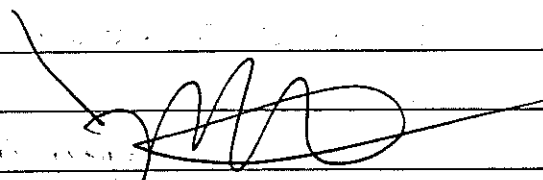
Enters facility in coils

80,000,000 lbs per yr.

Wire is drawn through dies

H₂O & oil based coolants

Scrap is sold back to seller



2

Oil & H₂O based waste is actually
closed-loop

But generates Filter Paper

System is cleaned once per yr

Use Heritage Env. Ind. for w.w.

1958

1 - Waste Oil = 41,000 - gal. steel

" "

2 - Waste water = 7,800 - steel

5,500 - steel

S-K, Chicago removes waste-oil

Wastewater - 146,000 gal/yr

Waste oil - 7,400 gal/yr

Copper Mud - bottoms from oil taken from
oil tank

Copper Mud - 20 drums / yr

Filter Paper = 56 drums / yr

Al sludge (Mud) 141 drums / yr

2nd operation

Enameling Process

35 pieces of Equipment

1) Goes to pre-Annealer 800 - 1,000° F

?

2) Quench H₂O

3) Enamel, numerous coatings

Over uses enamel & remainder is
returned.

After enameling, wire lubricant is applied
solvent, wax, oil

Scrap wire is coated - separate from
uncoated - generate at rate of 670/y

One area for Scraps

major solvents for enamel base
Xylenes -

Cresylic acid -

3 waste streams

Cresylic

NMP

Liquid - generated from cleanouts
off spec.

Solids - Anything that contacts coatings
rags, filters, gloves

4 satellite collection with 3 drums of
each type

3 types

Liquid cresylic

Liquid NMP

Solid - Cresylic & NMP

} Go to fuel
blender

Petro Chem in
Detroit

1,1,1-TCA used to clean wire

1 drum/y switched to Scott-Brite 1986
waste was soaked inside 55 gal drum

4

Enamels = Come to Facility

55 gal drums

300-500 gal. Totes

Tankers

Enamels are also stored in
8 above ground Tanks

~~8,000~~ - gal steel tank

9,300 - " "

PCBs - Generated from heating oil

Solids - Alabama

Incinerator - Chemical waste mgt.

Some small capacitors remain -

Asbestos - From Insulation

None remaining in stacks

Some in ovens - will remove

Sent to Adams Center landfill

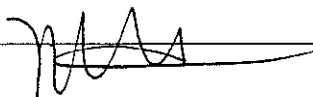
MEK - used for parts cleaning in maintenance

Now use standard solvent, blended
with waste oil

TCE - Same as MEK

* Hg - From QC Lab electrical contact

Managed in Lab



QC Lab = wastes are sent to
Fort Wayne Facility

5

Ethyl Carbamate = Possibly Lab

Lead = Mistakenly put on Part A

Freon 113 = Lab use QC to remove
lubricant 1 drum / 2 yrs

USTs = 5 on site - removed Oct. 89

* Get Copy of Report

PCB oil release 9/85 1-55 gal drum

* Get Copy of Report

Permits - IDEM Air Quality For VOC
emissions about 30 ovens

NPDES - Do not have one

Possible SWMUs

AOC

✓1) Waste Oil Tank

✓1) UST Area

✓2) Satellite Accum.

✓3) Scrap Metal

✓4) Incinerator

✓5) Drum Storage Area

✓6) Laboratory

sequence
ed

6

Photo 5...

1) E

Drum Storage Area

20 Liquid

10 Solid

Numerous non-Haz

Approximately 40' x 40'

1' High containment berm =

2) N - close up of drum

3) N - Drum Storage = Some cracks

4) S - Brass Accum area 10 4' x 4' boxes

5) S - Wire Storage Area

15' x 30' 6" floor small cracks

6) ^WSE - Wire satellite

7) S - Oil drip pan for compressor

waste is pumped out & sent to

W.O. Tank

8) S - Waste oil tanks & wastewater - mop H₂O

9) SE " "

50' x 75'

10) S - Filter Paper

11) W - Sump for mop H₂O

12) S - Stoddard solvent - Maintenance only 1

13) N - Satellite 4 drums

S - 3' x 10' Metal & Concrete floor

D026

D001

D001

D026

26

F003

0001

14) S - Crystalline acid drip tray

15) S - Satellite Accum

D001

D001

D026

16) N- Oven for enameling

17) N Satellite

⊙ ⊙ ⊙
D001+ D001 D026

18) S Excavated UST area

19) S "

20) SE - Drum of spent Freon near Laboratory

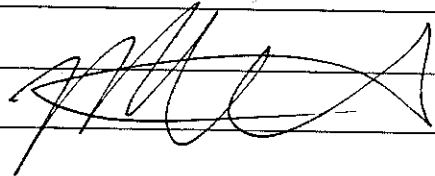
KS

Box 25

125

0026

AW





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 20, 1992

Mr. Peter von Stein
Rea Magnet Wire Company, Inc.
2800 Concord Road
Lafayette, Indiana 47905

Re: Visual Site Inspection
Rea Magnet Wire Company, Inc.
IND 005 478 219

Dear Mr. von Stein:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

April 20, 1992

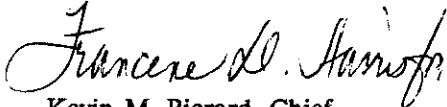
Page 2

The VSI has been scheduled for April 27, at 10:00 am. The inspection team will consist of Michael W. Gorman and Tony G. Dominic of Resource Applications, Inc., a contractor for the U.S. EPA. Representatives of the Indiana Department of Environmental Management (IDEM) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with the present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Attachment II is a summary of the information required.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Francene D. Harris", is written over the typed name "Kevin M. Pierard".

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: Tom Linson, Branch Chief, Hazardous Waste Branch, IDEM
Mike Sickels, Section Chief, Corrective Action, IDEM

ATTACHMENT I

Rea Magnet Wire Company, Inc.
2800 Concord Road
Lafayette, Indiana 47905

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

ATTACHMENT II

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Little information was available to compile a list of solid waste management units (SWMUs) at your facility. Please list all waste management units at your facility. If possible, please provide as complete information for the waste unit in response to the questions below.

From the list of probable SWMUs please address the following questions:

- Do the above SWMUs still exist at the facility and are they in operation?
 - What are the start-up and closure dates of the above SWMUs?
 - What types of wastes are the SWMUs currently/formerly used for?
 - Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste including satellite accumulation areas.
 - What are the average volumes and rates of generation of waste streams?
 - Document any releases that have occurred at the facility. This includes spills or leaks of both wastes and raw product. Outline the action taken to clean up the release.
2. Please supply as much information as possible concerning the site history. This would include any information you have regarding past operations and any former owners/operators at this location.
 3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.
 4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing current and former locations of SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.
- Copies of any permits currently held by the facility.
- SARA Title III information and a copy of the facility contingency plan.

Facility Name Rea Magnet Wine Co, Inc.
Location (City, State) Lafayette, IN
EPA I.D.# IND 005 478 219
Reviewer Name BF
Date of Review 3/19/86

SUMMARY OF FACILITY CERTIFICATION
REGARDING POTENTIAL RELEASES
FROM SOLID WASTE MANAGEMENT UNITS

(1) Are there any solid waste management units?

Yes _____

No X

Undetermined _____

(2) If answer to (1) is Yes, list the units by type, number and operating status. If answer to (1) is No or undetermined, go to Question (5).

	<u>Type of Unit</u>	<u>Status</u>
a.	_____	_____
b.	_____	_____
c.	_____	_____
d.	_____	_____
e.	_____	_____
f.	_____	_____
g.	_____	_____
h.	_____	_____
i.	_____	_____
j.	_____	_____

(3) For each type of unit listed in (2), summarize the types and volumes of wastes handled.

	<u>Type of Unit</u>	<u>Type of Waste</u>	<u>Volume of Wastes</u>
a.	_____	_____	_____
b.	_____	_____	_____
c.	_____	_____	_____
d.	_____	_____	_____
e.	_____	_____	_____
f.	_____	_____	_____
g.	_____	_____	_____
h.	_____	_____	_____
i.	_____	_____	_____
j.	_____	_____	_____

- (4) Summarize all releases of hazardous waste or constituents, and check box as to whether company claims it was fully corrected.

	<u>Releases</u>	<u>Corrected?</u>		
a.	_____	Yes _____	No _____	Undetermined _____
b.	_____	Yes _____	No _____	Undetermined _____
c.	_____	Yes _____	No _____	Undetermined _____
d.	_____	Yes _____	No _____	Undetermined _____
e.	_____	Yes _____	No _____	Undetermined _____
f.	_____	Yes _____	No _____	Undetermined _____
g.	_____	Yes _____	No _____	Undetermined _____
h.	_____	Yes _____	No _____	Undetermined _____
i.	_____	Yes _____	No _____	Undetermined _____
j.	_____	Yes _____	No _____	Undetermined _____

(5) Certification: Yes X No _____

(6) Is additional information necessary? Yes _____ No _____

(7) Comments: Certification signed by Technical Manager - signature
may not adequate.
Facility included copies of state compliance reports.

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Rea Magnet Wire Co., Inc.
EPA I.D. NUMBER: IND 005478219
LOCATION CITY: 2800 Concord Road
STATE: Lafayette, Indiana 47905

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	<u> </u>	<u>X</u>
• Surface Impoundment	<u> </u>	<u>X</u>
• Land Farm	<u> </u>	<u>X</u>
• Waste Pile	<u> </u>	<u>X</u>
• Incinerator	<u> </u>	<u>X</u>
• Storage Tank (Above Ground)	<u> </u>	<u>X</u>
• Storage Tank (Underground)	<u> </u>	<u>X</u>
• Container Storage Area	<u> </u>	<u>X</u>
• Injection Wells	<u> </u>	<u>X</u>
• Wastewater Treatment Units	<u> </u>	<u>X</u>
• Transfer Stations	<u> </u>	<u>X</u>
• Waste Recycling Operations	<u> </u>	<u>X</u>
• Waste Treatment, Detoxification	<u> </u>	<u>X</u>
• Other <u> </u>	<u> </u>	<u> </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

None

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

None

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

NELSON P. AYALA

Technical Manager

Typed Name and Title

Signature

Date

CONTINUING RELEASES AT PERMITTED FACILITIES

Sec. 206. Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (t) thereof:

"(u) CONTINUING RELEASES AT PERMITTED FACILITIES.—Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action."